

Offshore Cape Three Points Environmental and Social Monitoring Report (May 2021)

Entity: Vitol Upstream Ghana Ltd

Date: August 2021

Intended for

Vitol Upstream Ghana Limited and the International Finance Corporation

Date

August 2021

Project Number

1620010598

OFFSHORE CAPE THREE POINTS ENVIRONMENTAL AND SOCIAL MONITORING REPORT (MAY 2021)

OFFSHORE CAPE THREE POINTS ENVIRONMENTAL AND SOCIAL MONITORING REPORT (MAY 2021)

Project No. **1620010598**
Issue No. **1**
Date **3 August 2021**
Made by **C Halliwell, R Bisset and S Coey**
Checked by
Approved by **C Halliwell**

Made by: C Halliwell, R Bisset and S Coey
Checked/Approved by: C Halliwell



This report has been prepared by Ramboll UK Limited with all reasonable skill, care and diligence, and taking account of the Services and the Terms agreed between Ramboll UK Limited and the Client. This report is confidential to the Client, and Ramboll UK Limited accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by Ramboll UK Limited beforehand. Any such party relies upon the report at their own risk. Ramboll UK Limited disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the Services.

Version Control Log

Revision	Date	Made by	Checked by	Approved by	Description
1	11/06/21	CH, RB, SC	CH	CH	Draft issued to Client (not for disclosure)
1	15/07/21	CH, RB, SC	CH	CH	Final draft_non redacted (tracked)
1	3/08/21	CH, RB, SC	CH	CH	Final (for public disclosure)

CONTENTS

ACRONYMS AND ABBREVIATIONS

EXECUTIVE SUMMARY

	I
1. INTRODUCTION	1
2. SCOPE AND STRUCTURE OF THE REPORT	3
2.1 Scope of the virtual site visit	3
2.2 Project Standards	4
2.3 Structure of the Report	4
2.4 Limitations	5
3. PROJECT DESCRIPTION	6
3.1 Project description	6
3.2 Employment data	8
4. SIGNIFICANCE ASSESSMENT	10
4.1 Review Findings	10
4.2 Assessment of Significance	10
5. LEGISLATIVE FRAMEWORK AND OTHER PROJECT STANDARDS	12
5.1 Summary of legislative framework	12
5.2 Permitting	12
6. PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS	14
6.1 Requirements specified in the ESAP	14
6.2 HSE and SLC responsibilities and resources	14
6.3 Audit programme	21
6.4 Community Investment Strategy	23
6.5 Community Investment Strategy: QIPs	24
6.6 LDPj-CIS projects	27
6.7 Cumulative impacts and DAoI influx	28
6.8 Stakeholder engagement	31
6.9 Community and worker grievance mechanisms	32
6.10 Emergency Response Planning	34
6.11 Management of Change	35
6.12 Closure of earlier IESC findings	36
7. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS	41
7.1 Introduction	41
7.2 Demobilisation of workers	41
7.3 Occupational health and safety	42
8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION	47
8.1 Offshore monitoring campaign	47
8.2 Onshore Monitoring	47
8.3 Air quality	49
8.4 Noise	49
8.5 Greenhouse gas emissions (GHG)	50
9. PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY	54
9.1 Introduction	54
10. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT	60
10.1 Introduction	60
10.2 Land - focused economic displacement	60

11.	PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES	68
11.1	Introduction	68
11.2	Production Phase Sea Turtle BAP	69
11.3	Production Phase Avian BAP	72
11.4	No Net Loss Strategy for Natural Habitat	77
11.5	Vegetation Reinstatement and Alien Invasive Species	78
11.6	Site Drainage and Erosion Control	78
11.7	Marine Monitoring	79
12.	PERFORMANCE STANDARD 8: CULTURAL HERITAGE	82

APPENDICES

Appendix 1

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Appendix 2

PROJECT DOCUMENTATION PROVIDED FOR REVIEW

Appendix 3

MONITORING VISIT ITINERARY

Appendix 4

STATUS OF ISSUES IDENTIFIED IN PREVIOUS MONITORING VISITS

Appendix 5

PHOTOLOG

ACRONYMS AND ABBREVIATIONS

ACA	Additional Conservation Actions
AMR	Annual Monitoring Report
ATDU	Anaerobic Thermal Desorption Unit
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
CEMS	Continuous Emissions Monitoring System
CH ₄	Methane
CHMP	Cultural Heritage Management Plan
CIS	Community Investment Strategy
CLO	Community Liaison Officer
DAoI	Direct Area of Influence
EC	Energy Commission
E&S	Environmental and Social
E-PTW	Electronic Permit to Work
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESL	ESL Consulting
EHS	Environmental, Health and Safety
EPA	Environmental Protection Agency
ERP	Emergency Response Plan
ESHIA	Environmental, Social and Health Impact Assessment
FFI	Flora and Fauna International
FLO	Fisheries Liaison Officer
FMCC	Fisheries Management Coordination Committee
FPSO	Floating Production Storage and Offloading
GEA	Ghana Enterprise Agency
GES	Gas Export Sealine
GMA	Ghana Maritime Authority
GNGC	Ghana National Gas Company
GNPC	Ghana National Petroleum Corporation
GWS	Ghana Wildlife Society
HSE	Health, Safety and Environment
HSE and S	Health, Safety, Environment and Sustainability
IBA	Important Bird and Biodiversity Area
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IOCs	International Oil Companies
ITN	Insecticide Treated (Bed) Net
ITT	Invitation to Tender
kboe	Kilo barrels of oil equivalent
KPI	Key Performance Indicator
LDPj-CIS	Local Development Project-CIS
LTE	Landfall Terminal End
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
LRWG	Livelihood Restoration Working Group
MIGA	Multilateral Investment Guarantee Agency
MMO	Marine Mammal Observer
MoC	Management of Change
MoU	Memorandum of Understanding

MS	Management System
NAG	Non-associated Gas
NO ₂	Nitrogen Dioxide
O&G	Oil and Gas
OCTP	Offshore Cape Three Points
ORF	Onshore Receiving Facility
OHS	Occupational Health and Safety
OSRL WACAF	Oil Spill Response Limited West and Central Africa
PAC	Project-Affected Community
PAP	Project-Affected Person
PAC	Permanent Accommodation Camp
PC	Petroleum Commission
PM ₁₀	Particulate matter <10 microns in diameter
PPE	Personal Protective Equipment
PS	Performance Standard
PTW	Permit to Work
QMR	Quarterly Monitoring Report
RoW	Right of way
SEP	Stakeholder Engagement Plan
SHERPA	Safety Health Environment Radiological Protection Data Acquisition
SLC	Sustainability & Local Content
SMP	Security Management Plan
SO ₂	Sulphur Dioxide
TTIP	Takoradi to Tema Interconnector Project
Vitol	Vitol Exploration and Production Limited
Voluntary Principles	Voluntary Principles on Security and Human Rights
VUGL	Vitol Upstream Ghana Limited
VSV	Virtual Site Visit
WB	World Bank
WBC	Water Board Committee (of the potable water supply project)
WBG	World Bank Group
WMP	Waste Management Plan
WRCF	Western Region Coastal Foundation

EXECUTIVE SUMMARY

In May 2021, Ramboll UK Limited, acting in the role of Independent Environmental and Social Consultant (IESC), undertook the sixth in a series of 6-monthly/annual site visits to monitor the environmental and social (E&S) performance of the Offshore Cape Three Points (OCTP) Project, Republic of Ghana (the 'Project'). The Project is operated by Eni Ghana Exploration and Production Ltd (Eni Ghana). Vitol Upstream Ghana Limited (VUGL), an affiliate of Vitol Exploration and Production Limited (Vitol), and Ghana National Petroleum Corporation (GNPC) are JV non-operating partners. On this occasion, the site visit was 'virtual' due to COVID-19 travel constraints in place at the time which prevented an in-country visit.

The overall role of the IESC is to monitor the Project's management of E&S matters, including the implementation of the Project Environmental and Social Action Plan (ESAP); the adequacy of Health, Safety, Environment and Sustainability Management Systems; and the implementation of a suite of E&S management plans intended to address applicable Project standards, notably the World Bank Group (WBG) Performance Standards¹.

A three-person team, all with previous experience working on the OCTP, undertook the virtual site visit (VSV) joined by WBG representatives acting as observers during the VSV. Given the follow-up nature of the site visit, the primary objectives were to:

1. Confirm closure of the issues identified during previous visits/desk-top reviews;
2. Address any issues identified following review of the Project's 2020 Annual Monitoring Report and Q1, 2021 Quarterly Monitoring Report;
3. Conduct a virtual walkover of the Onshore Receiving Facility (ORF) including the Gas Export Sealine (GES) shore crossing;
4. Interview Eni Ghana's environmental/biodiversity monitoring consultants;
5. Monitor the ongoing implementation of Eni Ghana's E&S management plans including biodiversity plans, such as its Turtle and Avian Biodiversity Action Plans (BAPs);
6. Discuss recent progress, status and future work with respect to:
 - a. The water supply and education projects implemented under the 'Quick Impact Projects' (QIP) component of the (then) Community Investment Strategy; and
 - b. Other projects recently initiated/about to be initiated under the LDPj-CIS initiative²;
7. Discuss recent progress, status and future work with respect to:
 - a. The Livelihood Restoration 'Support Services';
 - b. Livelihood Restoration: monitoring and evaluation; and
 - c. Fisheries management.

In this context, the IESC planned a meeting with the Livelihood Restoration Working Group. On the day prior to the meeting, Eni Ghana informed the IESC that the meeting could not take place due to a combination of logistics/communications challenges and that it could not be organized within the time allocated to the VSV;

8. Discuss implementation of the Stakeholder Engagement Plan and the current situation regarding both community-level and workers' grievances and the status of grievances open at the time of the previous VSV;

¹ WBG Performance Standards refer to IFC (January 2012), WB (July 2012) and MIGA (October 2013) Performance Standards

² In October 2019, Eni Ghana issued a Management of Change Notification concerning a decision to extend the life of the Community Investment Strategy (CIS) by 1 year. In this Notification the CIS is referred to as the Local Development Project-CIS (LDPj-CIS). The term 'LDPj-CIS' is used in this report to refer to the extended CIS.

9. Discuss a recent analysis of population growth in the DAoI³ communities and the extent of influx;
10. Revisit compliance with the ESAP (updated February 2018); and
11. Identify any upcoming activities for further attention in future monitoring effort.

Regarding the first and second objectives, the IESC found that Eni Ghana had made good progress with the closure of the actions reported following the previous IESC monitoring trips. The IESC found that the Project to be compliant with the requirements of the ESAP, and that HSE and social matters are well managed. Nevertheless, 25 findings were identified during the virtual monitoring visit. Of these, 3 findings are of 'High' significance (two relate to the same issue: Livelihood restoration) and 5 are of 'Moderate' significance with the remainder being of 'Minor' significance. Below, the findings of 'High' and 'Moderate' significance are presented with the issue/s followed by the recommendation/s.

The findings categorised as 'High' relate to:

1. Fishing canoe incursions into the FPSO exclusion zone - The cumulative number of incursions in 2021 is unlikely to fall below the 2020 cumulative total of ~5,200 incursions. It is recommended that Eni Ghana:
 - Resumes recording data on the origin of vessels (including ownership details) entering the FPSO exclusion zone. If FPSO staff are reluctant to undertake the task of noting vessel identifiers, then the FLOs on the 'Pacific Python' should be given this task and, as necessary, two additional FLOs should be recruited to be based upon the FPSO and perform the same duties as the 'Pacific Python' FLOs; and
 - Implements its best endeavours to reach appropriate bilateral (with government security forces) or multilateral (with International Oil Companies and/or government security forces) Memoranda of Understanding/agreements that will reduce, significantly, the scale of fishing canoe incursions. Such Memoranda of Understanding/agreements must be compliant with PS4 requirements regarding deployment of government security personnel.
2. Livelihood restoration: Monitoring and evaluation - Eni Ghana is using a comparison of pre- and post-LRP household incomes as a metric for deciding on livelihood restoration status. There are four weaknesses in this approach:
 - Focus on incomes alone to determine livelihood restoration status is not aligned with the LRP approach to determining livelihood restoration status;
 - The comparisons exclude reduction of purchasing power due to inflation;
 - Revenues are compared to incomes, but reports do not justify the validity of this comparison clearly; and
 - 'Average' incomes are used. The IESC considers them to be not appropriate in this context as average incomes can conceal significant differences in performance by differing groups of Project Affected Persons (PAPs).

It is recommended that Eni Ghana implements the following four actions:

- Expanding, to the extent feasible, the metrics used to monitor and evaluate the status of livelihood restoration; ideally adding metrics that provide an indication that livelihood restoration, including aspects such as 'standard of living', is likely to be sustainable over time;
- Ensuring that comparisons of incomes pre- and post-LRP must take account of inflation before reaching a conclusion that livelihoods have been restored/improved;
- Future Eni Ghana and TechnoServe (TNS) reports to contain text that provides a justification for the approach of comparing revenues to incomes; and
- Avoiding use of average values, over all PAPs or groups of PAPs in evaluations on the status of livelihood restoration, unless they are complemented by more fine-grained information for different groups.

³ DAoI is the Direct Area of Influence (of the OCTP Project), consisting of four nearby villages.

3. Livelihood restoration: Monitoring and evaluation - Current Eni Ghana and TNS, CBG's implementing partner, reporting on livelihood restoration status does not clearly and unambiguously provide a breakdown of livelihood restoration status between vulnerable and non-vulnerable PAPs. It is recommended that Eni Ghana ensures that vulnerable PAPs are identified clearly and livelihood restoration status for the vulnerable PAPs is presented, consistently, in all future reporting on livelihood restoration status.

The findings categorised as 'Moderate' relate to:

1. Water Supply Project - Within the space of almost two years, exceedances of two water quality parameters (pH and then phosphates) have been found with the most recent exceedance occurring in May 2021. Currently, sampling occurs every six months. It is recommended that the frequency of sampling is increased until water quality is shown to meet, consistently, drinking water standards to ensure that community health is not compromised. Eni Ghana should forward this recommendation to the Water Board Committee and to enter into a discussion with the Committee to reach agreement on how the increased sampling costs will be met and a decision made on the required future sampling frequency once the Committee is confident that water quality meets the required standards.
2. Onshore security management at ORF - An informal arrangement exists between Eni Ghana and the military police with respect to the detachment of military police based in the vicinity of the ORF. It is recommended that Eni Ghana continues to implement its best endeavours to reach a formal agreement with the military police (this agreement is to be compliant with PS4 requirements regarding deployment of government security personnel).
3. Onshore security management at ORF - There is now a permanent police presence at the ORF and there is a pre-existing agreement between G4S and the police. The details of the agreement appear not to be known by Eni Ghana. It is recommended that Eni Ghana takes steps to ensure that it is fully aware of the terms of the agreement and considers its implications in terms of Eni Ghana's ability to abide by the security standards that apply to the Project, in particular the need to be compliant with PS4 requirements regarding deployment of government security personnel. As necessary, action should be taken through a local variation to the agreement to ensure that the agreement is aligned with Eni Ghana's expectations.
4. Community health and safety - recently-installed electricity connections on certain LRP 'options' structures are installed on external walls with minimal protective enclosures and exposed wires that are within easy reach of children. It is recommended that Eni Ghana undertakes a community-focused health and safety risk assessment of all the electrical connections to 'options' structures and implements measures that will reduce the risk to an acceptable level, where necessary.
5. Livelihood restoration: LR Programme 'Support Services' - implementation of the Livelihood Restoration Plan is expected at the end of July 2021. Purchase requisitions, to enable certain necessary services to be implemented, were only submitted recently. Assuming procurement can be finalized by the end of May 2021; this leaves only two months for implementation of the required services and the expected results, in terms of livelihood restoration, to occur. It is recommended that Eni Ghana gives priority to completion of the procurement process so that the services can be delivered as quickly as possible.

The findings presented in this report should be incorporated within Eni Ghana's audit findings and action tracking/closure process, with evidence of corrective actions provided via the Lenders' quarterly reporting process.

1. INTRODUCTION

Ramboll UK Limited ('Ramboll') was commissioned in January 2017 by Vitol Upstream Ghana Limited (VUGL) to undertake environmental and social monitoring (E&S) of the Offshore Cape Three Points (OCTP) Project (the 'Project'), Republic of Ghana. The Project is operated by Eni Ghana Exploration and Production Ltd (Eni Ghana). VUGL, an affiliate of Vitol Exploration and Production Limited (Vitol), and Ghana National Petroleum Corporation (GNPC) are JV non-operating partners.

In fulfilling the role of Lenders' Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to a consortium of lenders (the 'Lenders') to the Project, including the International Finance Corporation⁴ (IFC), World Bank⁵ (International Development Association) and the Multilateral Investment Guarantee Agency⁶ (MIGA) which are all members of the World Bank Group (WBG).

This report provides the findings following the sixth of a series of independent monitoring visits in which the Project is assessed against agreed E&S management plans which in turn were developed to meet the applicable Project Standards, including the WBG Performance Standards and applicable WBG Environmental, Health and Safety (EHS) guidelines.

A three-person team, all with previous experience working on the OCTP, undertook the virtual site visit (VSV) joined by WBG representatives, acting as observers during the VSV. Given the follow-up nature of the site visit, the primary objectives were to:

- Confirm closure of the issues identified during previous visits/desk-top reviews;
- Address any issues identified following review of the Project's 2020 Annual Monitoring Report and Q1, 2021 Quarterly Monitoring Report;
- Conduct a virtual walkover of the Onshore Receiving Facility (ORF) including the Gas Export Sealine (GES) shore crossing;
- Interview Eni Ghana's environmental/biodiversity monitoring consultants;
- Monitor the ongoing implementation of Eni Ghana's E&S management plans with special attention afforded to biodiversity plans such as its Turtle and Avian Biodiversity Action Plans (BAPs) and, also, the Stakeholder Engagement Plan;
- Review the work being done to assist PAPs to generate revenues and approaches being taken to monitor and evaluate livelihood restoration status (the LR Programme 'Support Services' component, of LRP implementation is due to finish at the end of July 2021);
- Review progress in extending the potable water supply project and work to complete the education project; both implemented under the 'Quick Impact Projects' (QIP) component of the (then) Community Investment Strategy';
- Review projects recently started or about to be started under the LDPj-CIS initiative⁷;
- Review the operation of the Grievance Mechanism;
- Discuss the results of recent work to ascertain the populations of the four DAoI communities and to evaluate the scale of influx;
- Receive an update on fishery management issues; and
- Revisit compliance with the ESAP (updated February 2018).

⁴ Lender to VUGL debt financing package

⁵ Guarantor to support the gas development

⁶ Insurer for the lenders to VUGL, including Equator Principles Banks and Export Credit Agencies.

⁷ In October 2019, Eni Ghana issued a Management of Change Notification concerning a decision to extend the life of the Community Investment Strategy (CIS) by 1 year. In this Notification the CIS is referred to as the Local Development Project-CIS (LDPj-CIS). The term 'LDPj-CIS' is used in this report to refer to the extended CIS.

Face-to-face interviews were held primarily with Eni Ghana's:

- Health, Safety and Environment (HSE) Team;
- Sustainability and Local Content (SLC) Team;
- Security Manager; and
- Eni HQ, Milan

Further face-to-face interviews/meetings were held with representatives of the following Eni Ghana contractors, including:

- ESL Consulting; and
- Flora and Fauna International.

VUGL's HSE & Social Assurance Manager was present during many interviews/meetings and available to answer any questions raised by the IESC. Also, representatives from the World Bank Group (IFC and MIGA) participated in the virtual monitoring visit. Eni Ghana and Vitol made available all personnel requested by the IESC and fully cooperated with all requests made by the IESC throughout the visit.

2. SCOPE AND STRUCTURE OF THE REPORT

2.1 Scope of the virtual site visit

As a condition of the Project ESAP (Appendix 1), Eni Ghana and VUGL are required to appoint an IESC to monitor and report on the implementation of the ESAP and compliance with WBG Performance Standards and Project E&S commitments.

This E&S Monitoring Report details the Project's compliance with the applicable Project Standards listed in Section 2.2, and in doing so, presents the E&S risks associated with the Project. It has been prepared for the attention of VUGL, the IFC and other entities defined as relying parties⁸. It addresses the various components of the Project (as defined in Section 3, Project Description).

The report presents the findings of the May 2021 VSV based on information gained following: interviews with Eni Ghana personnel and certain contractors. The IESC planned a meeting with the Livelihood Restoration Working Group (see Day 3 of the VSV itinerary at Appendix 3). On the day prior to the meeting, Eni Ghana informed the IESC that the meeting could not take place due to a combination of logistics/communications challenges and that it could not be organized within the time allocated to the VSV.

This report also provides a description of visual observations made based on photographic evidence provided of the Project facilities, notably reinstatement of temporarily disturbed land, the ORF, the GES shoreline crossing, the delivery of the LR Programme 'Support Services' and the education and water supply projects.

A full list of Project documentation reviewed during preparation of this E&S Monitoring Report is provided in Appendix 2.

The VSV was undertaken during the period 10-14 May 2021. The tasks performed are summarised below and detailed in the VSV itinerary (Appendix 3): Meetings and interviews, primarily concerned the management and monitoring of the following Project Health, Safety, Environment (HSE) and Sustainability and Local Content (SLC) aspects, were held:

- Project status (closure of all construction-related issues);
- HSE and SLC resourcing;
- Audit and inspection programmes (HSE and SLC);
- Permitting;
- COVID-19 protocols;
- Management of change (MoC);
- Environmental monitoring (offshore);
- Greenhouse gas emissions monitoring and reporting;
- Waste management;
- Emergency response;
- Extension of LRP implementation (LR Programme 'Support Services' component) which is due to be completed by end July 2021;
- Monitoring and evaluation work to determine livelihood restoration status of 205 households;
- Influx management;
- Management of cumulative impacts;
- CIS implementation (including status and progress for two QIPs; water supply and education);

⁸ Relying parties include Eni Ghana and the World Bank, MIGA, and other lenders.

- Stakeholder engagement/Grievance Mechanism;
- Occupational Health and Safety (OHS) plans and procedures;
- Security management (offshore – FPSO, and onshore - ORF); and
- Status of ESAP requirements.

Open findings from site visits/desk top studies were also revisited and closed where possible.

2.2 Project Standards

In accordance with the IESC's Terms of Reference, the Project was assessed against the following standards and guidelines:

- Applicable laws and regulations of Ghana;
- WBG Performance Standards (2012):
 1. PS1: Assessment and Management of Environmental and Social Risks and Impacts;
 2. PS2: Labour and Working Conditions;
 3. PS3: Resource Efficiency and Pollution Prevention;
 4. PS4: Community Health, Safety, and Security;
 5. PS5: Land Acquisition and Involuntary Resettlement; and
 6. PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- WBG Environmental Health & Safety (EHS) Guidelines applicable to the Project including:
 1. EHS General Guidelines (2007);
 2. EHS Guidelines for Offshore Oil and Gas Development (2015); and
 3. EHS Guidelines for Onshore Oil and Gas Development (2007).

PS7 (Indigenous Peoples) was excluded from the scope of the independent monitoring on the basis that the E&S Due Diligence⁹ performed prior to financial close concluded that no Indigenous Peoples are affected by the Project.

PS8 (Cultural Heritage) was excluded from the IESC's scope, however some text is included in IESC monitoring reports as appropriate, especially in relation to chance finds, shrines, and the royal cemetery. In this report an update on protection of the royal cemetery is provided.

2.3 Structure of the Report

Section 3 below describes the status of construction/production activities at the time of the visit. Section 4 describes how different levels of significance are attributed to issues highlighted in the report, and Section 5 outlines the Ghanaian legislative framework and other applicable Project Standards. The report is then structured around the seven IFC Performance Standards that are applicable to the Project. The key issues identified during the monitoring visit are summarised in 'significance tables' for each Performance Standard. The status of residual open issues from previous monitoring reports is provided in Appendix 4; these are closed where possible based on discussion and findings made during the VSV.

The report has endeavoured to provide a balanced opinion, providing examples of good practice. However, being a compliance report covering a broad range of aspects, it does focus mostly on observations and non-compliances.

⁹ An environmental and social due diligence (ESDD) exercise was performed by KBC Process Technology Ltd on behalf of potential lenders [Ref - Environmental and Social Review OCTP Project, Ghana September 2016]. The ESDD Report identified a number of issues and made recommendations that were transposed into an Environmental and Social Action Plan (ESAP). The ESAP provided in the ESDD report formed the basis of the final agreed ESAP included in Appendix 1 of this report.

2.4 Limitations

The findings expressed in this report are based on a VSV because COVID-19 travel restriction prevented an in-country site visit. Findings are, therefore, based on desk-top review of material provided by Eni Ghana supplemented by targeted teleconference calls with representatives from Eni Ghana's Safety & Environment & Quality¹⁰ (SEQ) and SLC teams. Photographic and video evidence requested by the IESC was presented during the VSV with the opportunity for live streaming of images at the IESC's request.

The IESC has not duplicated all information provided in previous reports. As necessary, to obtain background information/context in relation to this report, this report should be read in conjunction with previous IESC reports listed in the Table 2-1.

Table 2-1: List of IESC monitoring reports

Report title	Site visit/desk-top review	Reporting period	Date of Issue
Offshore Cape Three Points Environmental and Social Monitoring Report – 2019 AMR, Q1 2020 QMR AND Q2 2020 QMR	Desk-top virtual site visit	1 st July 2019 to 30 th June 2020	December 2020
Offshore Cape Three Points Environmental and Social Monitoring Report – Q2, 2019 QMR	Desk-top	1 st April to 30 th June 2019	November 2019
Offshore Cape Three Points Environmental and Social Monitoring Report (status in May 2019)	Site visit	19 May to 23 May 2019	July 2019
Offshore Cape Three Points Environmental and Social Monitoring – Q4, 2018 QMR	Desk-top	1 st October to 31 st December 2018	April 2109
Offshore Cape Three Points Environmental and Social Monitoring – Q3, 2018 QMR	Desk-top	July 2018 to September 2018	February 2019
Offshore Cape Three Points Environmental and Social Monitoring Report (status in September 2018)	Site visit	17 September to 21 September 2018	December 2018
Offshore Cape Three Points Environmental and Social Monitoring – Q1 and Q2, 2018 QMR	Desk-top	January 2018 to June 2018	October 2018
Offshore Cape Three Points Environmental and Social Monitoring Report (status in March 2018)	Site visit	16 September to 16 March 2018	July 2018
Offshore Cape Three Points Environmental and Social Monitoring – Q3, 2017 QMR	Desk-top	June 2017 to September 2017	December 2017
Offshore Cape Three Points Environmental and Social Monitoring Report (status in September 2017)	Site visit	21 February 2017to 15 September 2017	November 2017
Offshore Cape Three Points Environmental and Social Monitoring – Q1, 2017 QMR	Desk-top	January 2017 to March 2017	June 2017
Offshore Cape Three Points Environmental and Social Monitoring Report (status in February 2017)	Site Visit	Period up to 20 th February 2017	May 2017

¹⁰ SEQ used interchangeably with HSE.

3. PROJECT DESCRIPTION

This section is intended to provide a brief description of the Project and the status of construction/production activities at the time of the VSV. It also highlights any material design changes that might result in HSE and S impacts.

3.1 Project description

The Project, as described in the Phase 1 and Phase 2 ESIA Reports, involved the development of the Sankofa East oil field and non-associated gas in the Sankofa and Gye Nyame Gas Fields, which are located offshore, 55 to 60 km from the coastline of the Western Region of the Republic of Ghana (Figure 3-1). Eni Ghana has developed these fields as an integrated oil and gas development Project utilising a newly converted double-hulled FPSO facility. Other key components of the Project include:

- Fourteen wells for oil exploitation (producing and injection wells); oil is transferred to tankers for direct export to market;
- Five wells for non-associated gas exploitation;
- A 63km subsea gas pipeline from the FPSO to shore;
- A 1.5 km onshore gas pipeline from the shore to the ORF;
- The ORF (Figure 3-2), including a gas compressor station, pilot and permanent accommodation camps, firefighting station, helipad and medical facility; and a tie-in to the existing Ghana National Gas Company (GNGC) 20-inch gas pipeline; and
- A logistics base in Takoradi and a quay within the port of Takoradi.

The Project is split into two phases:

- Phase 1: Oil Development Project. This phase consists of the 14 subsea wells (8 oil producers, 3 water injectors and 3 associated gas injectors), subsea facilities, and a FPSO unit that would be located approximately 60 km offshore south of Sanzule; and
- Phase 2: Gas Development Project. This phase will consist of 5 subsea wells, subsea facilities, gas treating facilities on the FPSO unit, a 63km subsea gas pipeline (known as the gas export sealine or GES), the ORF, and tie-in with the GNGC sales gas pipeline.

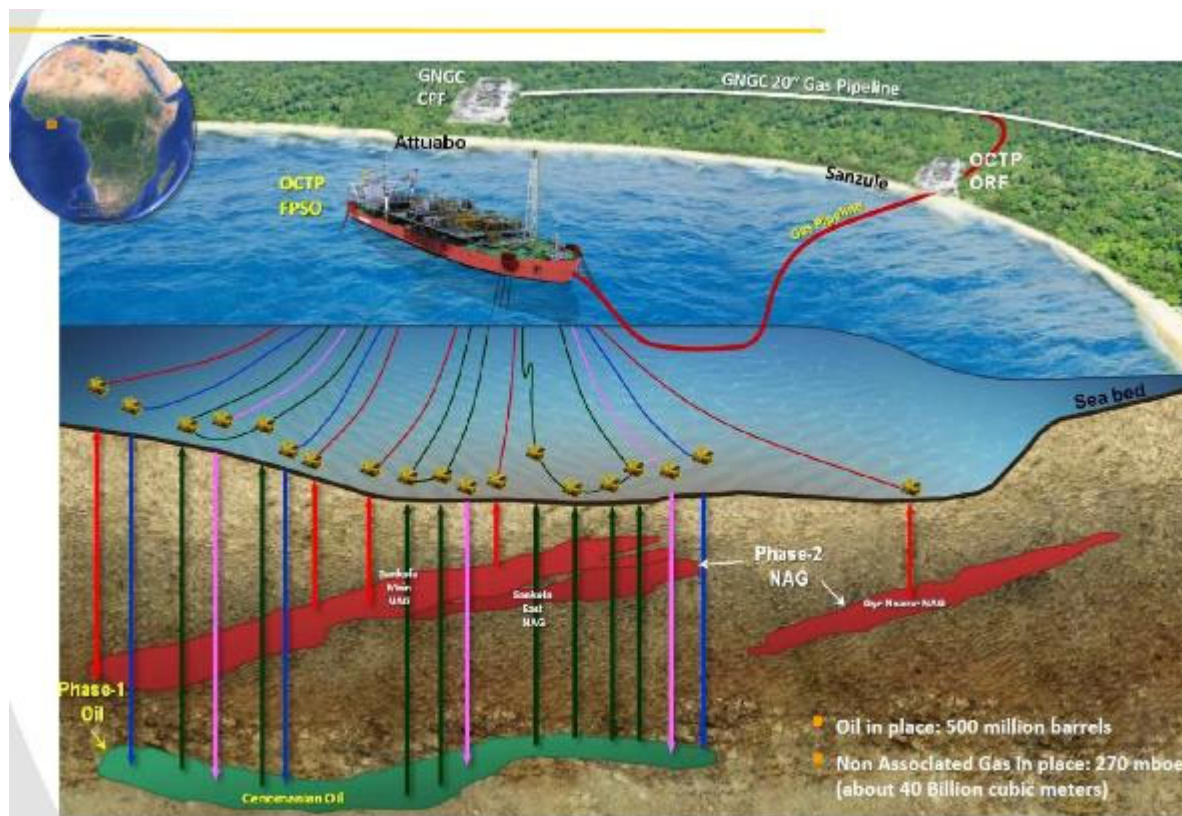


Figure 3-1: Schematic of the OCTP Project (pre infill wells)

Material Project design/scope changes since the ESIA Report was prepared include 3 infilling wells, the upgrade of regulating and metering stations with a short interconnecting pipeline in Takoradi associated with the West Africa Gas Pipeline and a revised approach to the nearshore pipeline installation/beach crossing. The changes have been described in previous reports and are not duplicated here.

3.1.1 Status of the Project at time of the monitoring visit

The Project is well into its Production stage with first oil achieved in Q2, 2017 and first gas in Q3, 2018. At the time of the May 2021 VSV:

- The FPSO had been in position and lifting oil since mid-2017;
- Drilling and completion of the original 20 subsea wells accomplished (10 oil producing; 5 gas producing, 3 gas injection; 2 water injection);
- Construction of the ORF tie-in to the GNGC gas pipeline completed;
- The GES was installed with gas being exported to the ORF since 4th August 2018; post lay trenching (to lower the GES at the beach landfall) was completed in November/December 2018;
- All three compressors were operational, and gas was being supplied to the GNGC gas sales pipeline for onward distribution;
- Fencing, including additional fencing needed for security purposes, was erected;
- Reinstatement of disturbed land progressing was ongoing;
- Three infill wells had been completed; and
- The permanent accommodation camp was constructed (in Q3, 2019).

In summary, residual construction activities, primarily associated with the Permanent Accommodation Camp, were completed in 2019. Since that time the Project has been in steady-state production.

In addition to the original Project described in the ESIA Report, Eni Ghana took on responsibility for the design and construction of the Takoradi to Tema Interconnector Project (TTIP). Construction works at each of three hubs in Takoradi (GNGC and WAPCo) and Tema (WAPCo) were completed and returned to their respective operators in 2019 and February 2020 respectively. Project Close Out for the TTIP was achieved in July 2020, thus, Eni Ghana does not have ongoing responsibility for these sites and the operation of these sites is not part of the IESC's review scope.



Figure 3-2: Onshore facilities (drone photo in late 2019)

3.1.2 Foreseen activities in 2021 are:

- Conversion of a gas injection well (GI-3) to an oil producer, anticipated to occur in Q3, 2021;
- Load Bank installation on ORF MPGs for generators output optimization;
- Non-associated gas (NAG) system debottlenecking to boost the NAG system capacity to 260MMScfd; and
- 3rd HP Flash Compression System – installation of 3rd compression train to boost gas injection on FPSO.

3.2 Employment data

The analysis of employment data covers two of the main operational facilities: the ORF and the FPSO. For both the ORF and FPSO data are provided for end 2019, end 2020 and end April 2021. Presenting data for these consecutive dates enables comparisons to be made and noteworthy changes to be identified. Table 3-1 presents the employment breakdown for the two sites. The total workforce at each site is provided for both direct workers (that is employed by Eni Ghana) and for contracted workers; however, the breakdown of the employment data into worker

categories (such as females or workers from the DAoI¹¹) applies to the total number of workers only.

It should be noted that security guards at ORF are excluded from the analysis as no data on categories is provided in the AMRs/QMRs. The security provider (G4S) operates an 8-hour shift with 60 guards at the ORF. It is possible that some of these guards are female and are DAoI residents, but as mentioned, these data are not provided. It is recommended that Eni Ghana report on the same characteristics for security staff as done for all other direct and indirect workers, starting from preparation of the Q3 2021 QMR.

Table 3-1: ORF and FPSO Employment Breakdown

Location	Year	# Total Workers (Direct: contracted)	#Females	# Ghanaian	# DAoI	# Expatriates
ORF	12/2019	154 (38:116)	4	148	21	6
	12/2020	43 (35:8)	0	39	0	4
	04/2021	114 (32:82)	18	108	48	6
FPSO	12/2019	209 (15:194)	1	130	0	79
	12/2020	199 (16:183)	1	129	0	70
	04/2021	201 (16:185)	1	135	0	66

Key changes at the ORF, comparing worker numbers between end 2019 and end April 2021, are:

- A decline in total workforce in 2020; down from 154 at the end of 2019 to 43 at the end of 2020. This reduction resulted in the loss of 21 workers from the DAoI with no employee being a resident of the DAoI;
- A noticeable increase in total workforce in Q1 2021 to end April 2021 (mostly consisting of contractor workers and therefore likely to be temporary; with the direct workforce remaining relatively stable). This increase is seen clearly in the rise of the number of DAoI workers from 0 to 48; and
- This recent increase in workers has resulted in the number of female workers rising from 0 to 18

With respect to the FPSO, over the period end 2019 to end April 2021, the total number of workers and the breakdown by worker category has remained relatively stable. The most noticeable change is the reduction of expat workers: down from 79 at end 2019 to 66 at the end April 2021. *Post-VSV note: FPSO contractors confirmed, to Eni Ghana, that this reduction is due to succession planning as required to reach local content and localization levels enshrined in the Petroleum (Local Content And Local Participation Regulations 2013, (LI 2204, of November 2013). Company actions/performance are monitored and regulated by the Petroleum Commission.*

¹¹ DAoI is the Direct Area of Influence (of the OCTP Project), consisting of four nearby villages.

4. SIGNIFICANCE ASSESSMENT

4.1 Review Findings

A summary of the review findings is presented in a significance table at the end of each section (see Table 4-1 for an example of the summary table format). For each item, the following is presented:

- The aspect;
- A description of the issue, for example deficiencies or omissions;
- Identification of the standard(s) against which the deficiency or omission has been identified;
- The IESC’s recommendation, where applicable, to resolve/manage the deficiency or omission; and
- The significance of the issue on a three-point scale (see below for criteria).

4.2 Assessment of Significance

A ranking system has been used to indicate the relative significance of an issue identified during the monitoring visit. As well as highlighting the most important areas requiring attention, it can also be used to aid the tracking and rectification of specific items requiring improvement.

Identified issues have been placed into one of the following four categories:

Minor: Minor non-compliance, risk or minor technical breach of Applicable Standards and commitments with no material, actual or likely potential: environmental or social consequences; or significant human injury or harm.

Moderate: Moderate non-compliance or risk with actual or likely potential: localised and short-term environmental or social consequences; minor human injury or harm; or material short-term breach of Applicable Standards and commitments.

High: Major non-compliance or risk with actual or likely potential: spatially extensive and/or long-term environmental or social consequences; serious human injury/death or harm; or material and extensive breach of Applicable Standards and commitments.

Not Applicable Issue is noteworthy, but it is not a matter of non-compliance.

Where time-critical recommendations are made (for example, for specific actions), a timeframe linked to Construction/Production phase milestones is indicated in the IESC Recommendations’ column. Time-critical issues can lead to a higher classification of significance. Similarly, findings made in earlier reports that have not been addressed may be given an elevated significance categorisation in this report. Where possible an indicative date for completion is provided in parentheses under the Significance rating.

Table 4-1: Example of the summary table format

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities. To date the Company has been unable to procure monitoring	WBG EHS Guidelines ESAP	<i>Company X shall expedite procurement of monitoring equipment with the</i>	Moderate (within 3 months of issue of this report)

Offshore Cape Three Points

		equipment – no monitoring has been undertaken.		<i>support of senior management.</i>	
--	--	--	--	--------------------------------------	--

5. LEGISLATIVE FRAMEWORK AND OTHER PROJECT STANDARDS

5.1 Summary of legislative framework

The undertaking of projects such as oil and gas developments requires registration and authorisation by the Ghana Environmental Protection Agency (EPA). The EPA was established under the Environmental Protection Agency Act (Act No. 490 of 1994) as the leading public body responsible for the protection and improvement of the environment in Ghana. The EPA has the authority to require an EIA Report and is responsible for issuing and enforcing requirements specified in environmental permits. Permits are also required from other regulatory bodies including the Petroleum Commission (PC), Energy Commission (EC) and, for projects with coastal/offshore facilities and/or activities, the Ghana Maritime Authority (GMA).

5.2 Permitting

The status of the Project's permits has been discussed in preceding IESC monitoring reports. Following the gradual transition from the Construction to the Production Phase the nature of the Permits has changed, with only a limited number of Production Phase permits required. Key permits and their validity status are presented in the table below:

Table 5-1. Status of key permits

Issuing authority	Permit details	Validity (renewal/expiry date)
Ghana Environmental Protection Agency (EPA)	OCTP Block Phase 1_Oil Production Operations Permit	23 March 2023
Ghana Environmental Protection Agency (EPA)	OCTP Block Phase 2_ Gas Production Operations Permit	1 October 2022
Ghana Maritime Authority (GMA)	Permit to Operate FPSO and Subsea Facilities in Ghana waters.	10 October 2021
Ghana Maritime Authority (GMA)	Establishment of exclusion safety zones around field and vessels	Discussion with IMO on the renewal process ongoing.
Ghana Maritime Authority (GMA)	Permit to Operate FPSO and Subsea Facilities in Ghana waters.	Renewal process ongoing
Petroleum Commission (PC)	Production Permit (oil and gas phase)	Renewal process ongoing - application submitted on time

The IESC confirms that key permits from the EPA are in place for the Project. However, the renewal of permits from other issuing authorities remain outstanding. These include the permit from the GMA for the establishment of offshore exclusion zones and a production permit (oil phase and gas phase) from the PC. For the latter, the permit application has been submitted and Eni Ghana is awaiting a response from the PC. Although this is not having an impact of operations, Eni Ghana should use reasonable efforts to liaise with issuing authorities in order to

expedite the issue of permits, or where this is not possible, receive confirmation in writing that Eni Ghana can continue to operate/permits are not required (e.g. where issuing authorities are slow to issue permits without reason).

6. PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

6.1 Requirements specified in the ESAP

The ESAP was revised with the Lenders agreement and reissued on the 1st of February 2018. The majority of ESAP items were closed as reported in previous monitoring reports; however, at the time of the preceding monitoring report in November 2020, certain management plans were still to be agreed with WBG/finalised, including:

1. Production Phase Avian Biodiversity Action Plan
2. Production Phase Sea Turtle Biodiversity Action Plan
3. No Net Loss [of biodiversity] Strategy
4. Security Management Plan (SMP).

At the time of reporting all outstanding issues have now been agreed/plans finalised to the satisfaction of the WBG, albeit not yet signed in the case of the SMP. Further commentary on these plans and their implementation is presented in later sections of this report.

6.2 HSE and SLC responsibilities and resources

The current SLC organigramme is shown in three parts (Figure 6-1a, Figure 6-1b, and Figure 6-1c). Eni Ghana confirmed that this organigramme is the official organigramme and will remain in place until an authorized update is issued.

Figure 6-1a shows the three key 'functional' posts and Figures 6-1b and 6-1c show the 'technical' posts devoted to supporting them. The organigramme is similar, but not identical, to the version presented in the IESC's 2019 AMR and Q1/Q2 2020 QMRs monitoring report. The main change is structural, as follows:

- Integration of all stakeholder engagement posts plus the post of Senior Community Labour Liaison Office under the Stakeholder and Local Development Manager (abolition of the post of Stakeholder Management Co-ordinator).

Other more minor changes are:

- The Stakeholder and Local Development Manager now has only one post focusing on 'Local Content' (previously there were two posts with this focus);
- The post entitled Monitoring and Evaluation (Eni Foundation) has been abolished; and
- The post of Fisheries Management Plan Delivery Officer has been transferred and is now under the Monitoring and Evaluation Coordinator.

The post of Civil Engineer Supervisor (reporting to the Local Sustainable Development Supervisor) remains due to the increasing pace of activities, under the LDPj-CIS initiative, which involve construction of differing kinds of facilities.

Of note, though not shown in the organigramme, the holders of most of the posts have remained. Overall, the lack of major change in terms of structure and personnel probably reflects the continuing stability of the Project's production phase when the issues to be managed are well-known and surprises are less likely, when compared to the construction phase.

The SLC department is made up of 28 members of staff with 13 based in Sanzule (compared to 16 at the end of 2019). This feature reflects the continuing implementation of the commitments

made, by Eni Ghana, to the local communities in the vicinity of the ORF. Overall, the IESC has no concerns over the SLC's structure and level of staff resourcing.

Organigrammes for the SEQ team were also presented during the VSV and are duplicated in Figure 6-2a and Figure 6-2b below. The SEQ organigramme has been revised since the IESC last reported on the SEQ structure in November 2020, with the current structure expected to be formally approved in the very near future. Since November 2020, although there has been some restructuring, the overall number of staff remain comparable with before. A key vacant post shown on the organigramme is the HSE Operations Manager. This post was also vacant in November 2020 (then referred to as the HSE Operations Coordinator); however, the IESC was informed that a candidate has been identified and was due to start work imminently, and indeed took up the position during the week of the IESC's audit. The other notable change is the introduction of an HSE Well Operations (WOPS) Coordinator and supporting team members, prompted by light well intervention¹² and drilling/well conversion activities in 2021, that will be based onshore and offshore. The IESC was assured by Eni Ghana that the Project is not facing any resourcing constraints with residual posts shown as 'TBA' in the organigramme expected to be filled soon. In addition, Eni Ghana receives specialist support on biodiversity matters from ESL¹³, Milan HQ and Flora and Fauna International¹⁴ (FFI).

¹² Light well intervention refers to well intervention that does not require a drilling rig and riser.

¹³ ESL is a specialist environmental consultancy based in Ghana

¹⁴ FFI is a specialist biodiversity consultancy based in the UK.

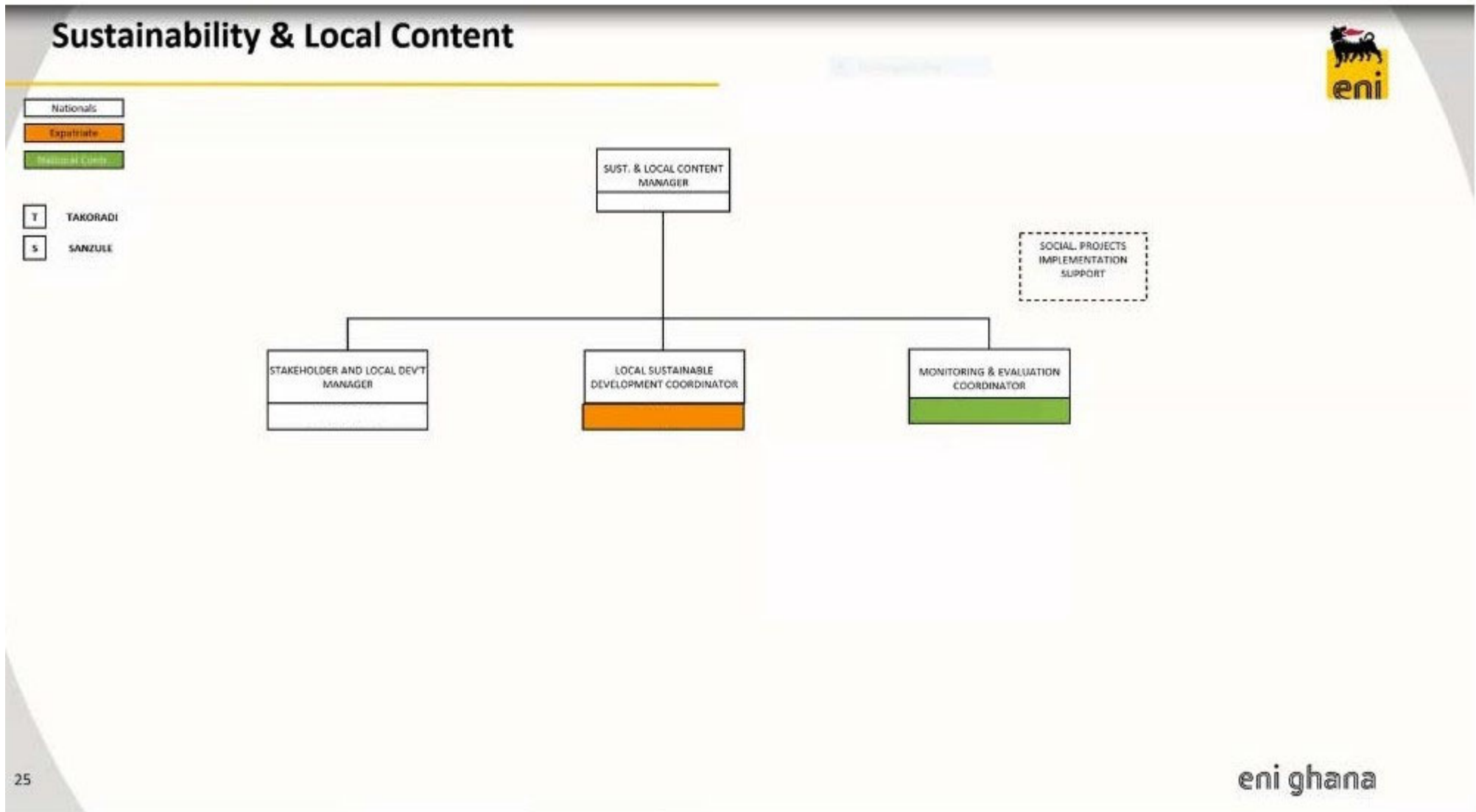


Figure 6-1a: Sustainability & Local Content Organigramme – May 2021

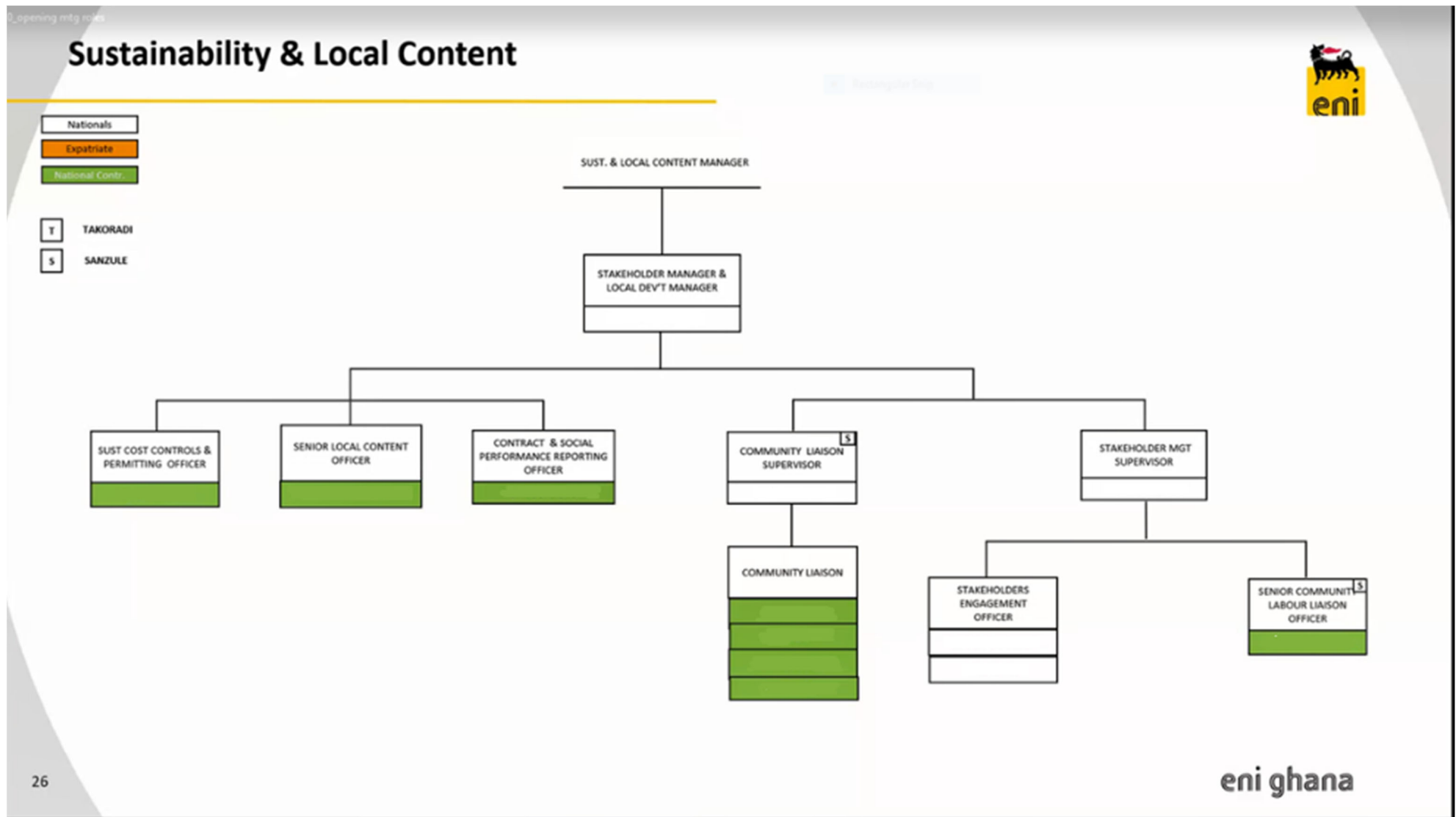


Figure 6-1b: Sustainability & Local Content Organigramme – May 2021 (continued)

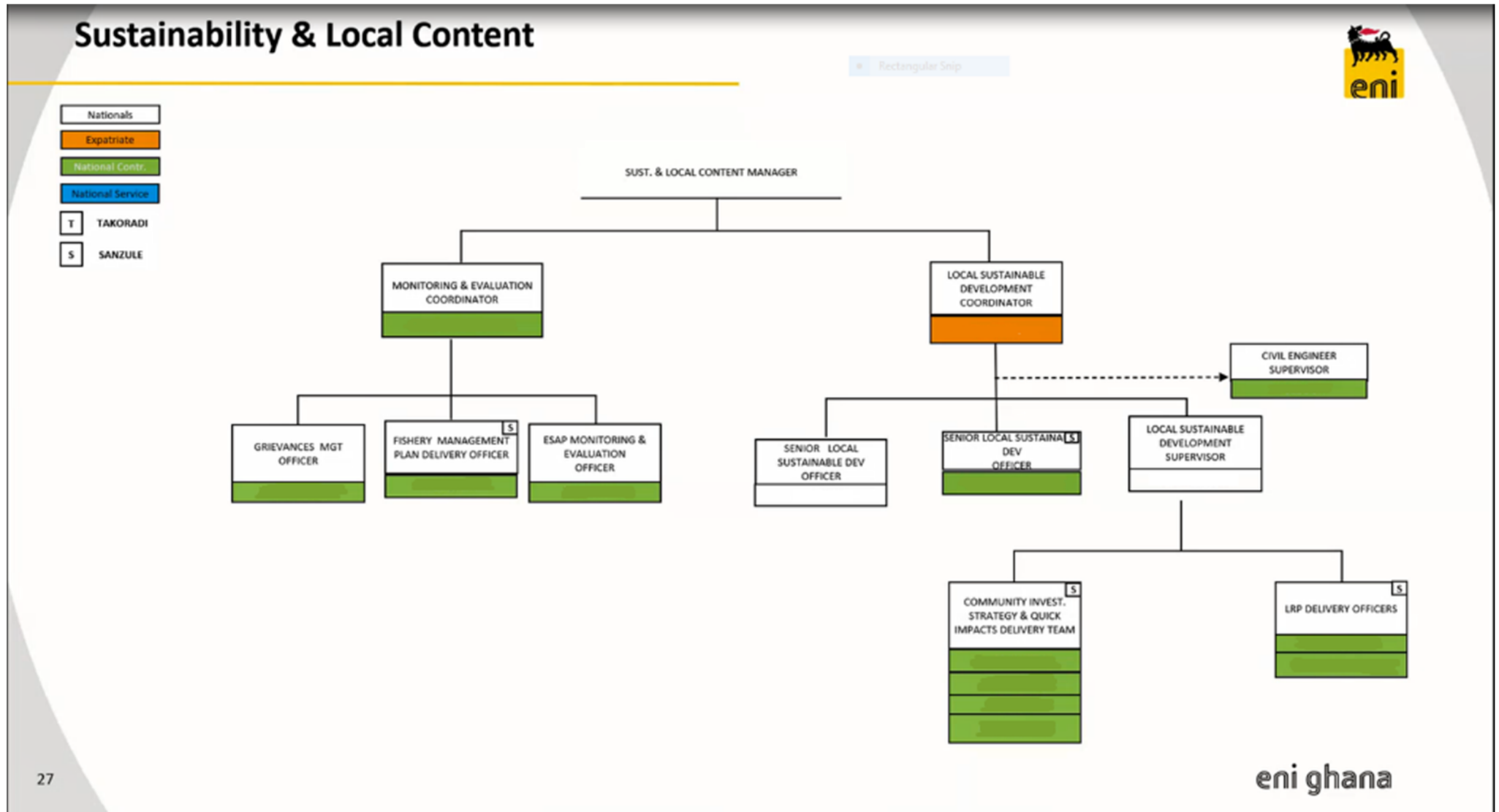


Figure 6-1c: Sustainability & Local Content Organigramme – May 2021 (continued)

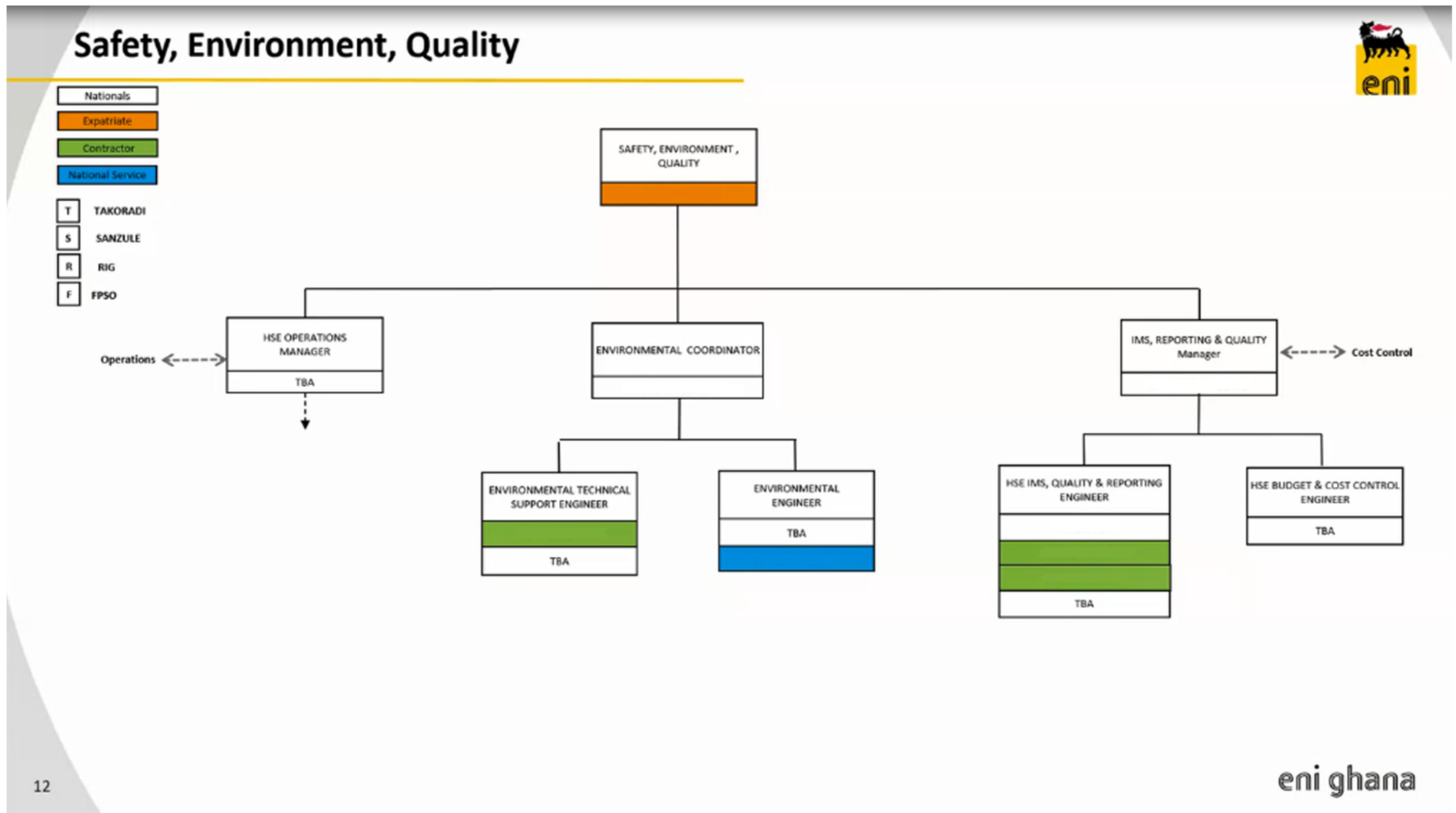


Figure 6-2a: Safety, Environment and Quality Organigramme – May 2021

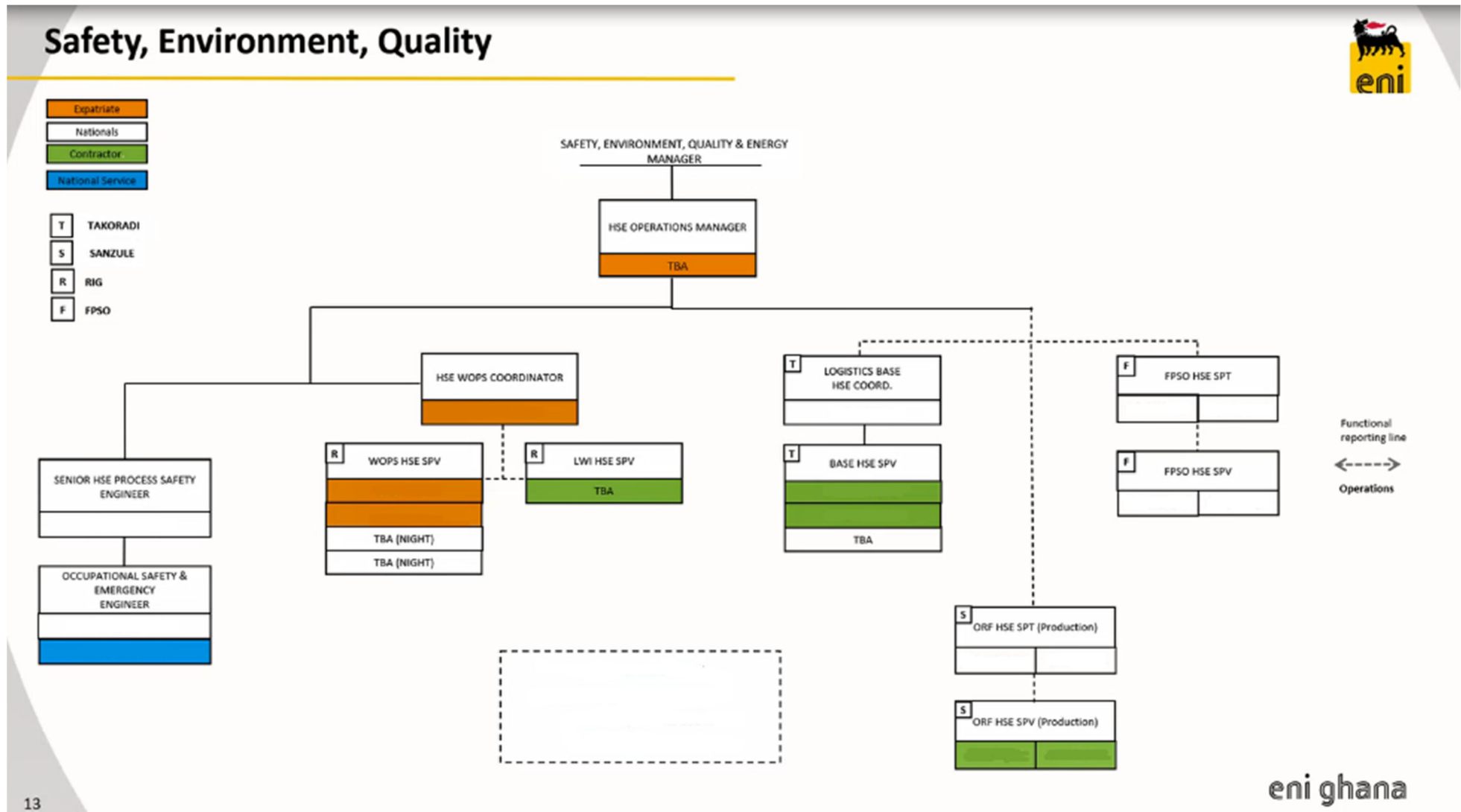


Figure 6-2b: Safety, Environment and Quality organigramme – May 2021 (continued)

Offshore Cape Three Points**6.3 Audit programme**

The IESC reviewed the 2021 audit programme (Ref. prog ms hse 001 eni ghana – 2021 HSE Audit Program). The programme provides a detailed schedule for 2021 and a high-level schedule of audits planned from 2022 through to 2024.

For 2021, seven major audits are scheduled which include a variety of internal (Eni Ghana) and external audits (WBG) plus audits by Eni Headquarters (Level 2 audits) as detailed below:

1. ISO Recertification Audit - ISO 14001 and OHSAS 18001 surveillance audits with migration to ISO 45001
2. WBG Requirements for HSE
3. HSE Contractors Compliance Audit - Waste Management Contractor
4. HSE Contractors Compliance Audit - Drilling Contractor
5. Level 2 HSE Technical Audit (Logistics Base, ORF, FPSO, Ghana Head office in Accra)
6. Level 2 Process Safety Audit
7. Legal and Compliance Review.

The IESC considers the audit programme to be appropriate and, specifically, is pleased to see that the risk-based programme includes an audit of the drilling contractor. Also, of note is the recertification audit (1). These audits are discussed in more detail below.

Of note, all recent audits have been conducted virtually and it is Eni Ghana's intention to continue with virtual audits through 2021 or until COVID-19 restrictions are lifted.

6.3.1 ISO Recertification Audit

The IESC previously confirmed that Eni Ghana has certificates for ISO 14001 (Environment), OSHAS 18001 (Occupational Health & Safety) and ISO9001 (Quality). Certificates for ISO 14001 and ISO 45001 were viewed during the VSV with both due to expire in December 2022. In the interim, a surveillance (annual) audit is planned for ISO 14001:2015 and ISO 45001 in December 2021.

6.3.2 HSE Contractors Compliance Audit; - Drilling Contractor

Eni Ghana has commissioned the services of Saipem to undertake the conversion of a well located in the OCTP block from a gas injection well (GI-3) to an oil producer in Q3, 2021. More specifically, a Saipem drillship (the 'Saipem 10000') will be used to complete the conversion works. Despite works within the OCTP block not commencing until later in the year, the Saipem 10000 has already been commissioned to undertake drilling elsewhere in the Ghanaian and Ivory Coast waters. The first well to be drilled by the Saipem drillship in 2021 is the EBAN 1-X well; this well is outside the scope of the OCTP Project being monitored by the IESC, however the procedures and processes put in place to manage HSE and social matters are the same and therefore generally applicable to the GI-3 well conversion.

Eni Ghana has undertaken pre-mobilisation inspection of the drillship including HSE and medical facilities inspections¹⁵. Furthermore, Eni Ghana has prepared an HSE Bridging Document¹⁶ for the Saipem 10000 drilling of the EBAN 1-X well. The purpose of the Bridging Document is to compare Saipem's management system with that of Eni Ghana and highlight any areas where Saipem's management system needs to be supplemented to meet Eni Ghana's requirements. For each management system component, a 'primacy' status is allocated to either the Eni Ghana plan/procedure or Saipem plan/procedure, with the latter given primacy where it meets Eni

¹⁵ HSE Inspection Report – DS Saipem 100000, April 2021 and Medical Facility Assessment Form (Offshore)

¹⁶ Eni Ghana /Saipem Offshore – Saipem 10000 Drillship HSE Bridging Document, April 2021.

Offshore Cape Three Points

Ghana's requirements. Following review of the Bridging Document the following key points are highlighted:

- The Eni Well Operations Manager (based in Accra) will have the following responsibilities:
 - ensuring that all aspects of the drilling campaign shall be undertaken as per approved design criteria and that Eni HSE expectations are met.
 - monitoring compliance with the Bridging Document and Eni standards by conducting internal reviews of systems with rig site organisation to identify gaps and develop action items as required.
- The Well Operations Manager will be supported by an Eni Ghana Drilling Supervisor and HSE Supervisor, both to be based on board the Saipem 10000.

Specific to environmental requirements, the Bridging Document clarifies that *"Eni [Ghana] is responsible for the preparation of site specific contingency plans, impact assessments and the location specific environmental requirements. Eni shall ensure Saipem 10000 is fully aware of environmental, legal and other requirements particular to the location and the operation"*.

For waste management the Bridging document states *"Any waste associated with the drilling process is the responsibility of Eni and shall be disposed of as per applicable regulations and Eni Ghana's procedures (WMP)"*.

A second key document associated with EBAN 1-X is the Regulatory Checklist for EBAN 1-X Well Drilling Campaign. This document further specifies the management of waste in accordance with the Eni Ghana Waste Management Plan and also the need to submit a report on sightings of marine mammals which will be recorded by contractor and reported to the regulator on a daily/weekly basis.

Following review of documentation produced for the EBAN 1-X well, the IESC can confirm that adequate processes are in place to manage HSE risks associated with the GI-3 well conversion and that Eni Ghana will have a permanent supervisory presence on board the drillship. In readiness for GI-3, timely preparation of updated documentation is required for GI-3 with specific references to WBG Performance Standards (for example, in the Bridging Document for GI-3) and to applicable environmental management plans in addition to the Waste Management Plan.

Specific management plans, or elements therein for consideration should include *inter alia*:

- Marine Traffic Management Plan;
- Marine Mammals and Sea Turtle Protection Policy and Plan (with respect to underwater noise and vessel movements);
- Well Control Emergency Response Plans (as per ESAP item #3), updated as necessary in light of the new drill ship; and
- Environmental monitoring and reporting.

Any applicable Eni Ghana management plans necessary to supplement Saipem's MS should be provided to Saipem.

6.3.3 HSE Contractors Compliance Audit; - Waste Management Contractor

The IESC reviewed an example audit report¹⁷ following the recent audit conducted by Eni Ghana of its primary waste management service provider, Zoil Services Limited (Zoil). The scope of the audit included evaluation against *inter alia*: applicable laws and regulations; HSE provisions in the contract and applicable Eni Ghana policy, plans and procedures. The audit also revisited issues identified in an early audit of Zoil conducted in 2017. The 2021 audit was conducted virtually.

¹⁷ Rep ms hse 127 eni ghana – HSE Audit. Zoil Services Limited (April 2021)

Offshore Cape Three Points

Audit findings requiring corrective actions are categorised as either a major non-conformity, minor non-conformity or an observation. Nine new findings were made during the 2021 audit, 3 of which were minor non-conformities with the remainder being observations.

The audit process appears to be robust; however, the IESC notes that three findings made during the 2017 audit, including one major non-conformity relating to the storage area of Oil Based Muds (OBMs), are given an 'opened' status, despite having been previously closed. The IESC considers the findings to be either variations to the original findings, or findings that have effectively been reopened by the recent audit. Regardless, they are considered open audit findings as of the date of the Waste Audit Report and Eni Ghana should follow up on significant 'open' actions on a regular basis and consider alternative disposal options for any future OBMs until the audit action is closed and it is satisfied with the OBM storage arrangements offered by Zoil.

6.3.4 EPA inspections

Ghana EPA undertakes annual inspections of the Project, however no on-site audits/inspection were undertaken by EPA in 2020 due to COVID-19 restrictions. Despite the postponement of the annual on-site inspection, the IESC is informed that Eni Ghana has frequent and ongoing interaction with the EPA and continues to submit periodic HSE reports as per agreed schedules. No dates have been set for the next EPA on-site inspection because of the ongoing uncertainty surrounding the pandemic and the need for stringent controls on-site.

6.3.5 Action tracking register

All audit findings are logged within an 'Action Tracker', including responsible parties, timeframes and agreed actions and evidence of closure. During the VSV, the IESC verified its suitability and the timely implementation of the tracker.

6.3.6 Security

During a meeting with the Security Manager, the IESC was informed that the SMP version, current in late 2020, was in the final stages of the review/commenting process with only a very few minor text changes to be made. The Security Manager confirmed that the current SMP version is being implemented by the Project. Further details on the SMP and project's security management risks and activities are provided in Section 9.3.

6.4 Community Investment Strategy

Since late 2019, Eni Ghana refers to the Community investment Strategy as the Local Development Project-CIS (LDPj-CIS). Its fundamental aim is to promote inclusive economic growth and well-being for 10 coastal communities in the Ellembelle District (which includes the four communities in the DAoI) over the period 2019 to 2022. The original duration (2019 to 2021) was extended by one year primarily due to delays in completing the CIS Implementation Plan which resulted in postponement of certain planned actions in 2019. There are four main components of the LDPj-CIS:

- Water and Sanitation;
- Education;
- Access to Energy; and
- Economic Diversification ('Livelihood' and 'Building Business' initiatives).

Key LDPj-CIS actions in H2 2020 and the period up to end April 2021 included:

- Inauguration of LDPj-CIS Steering Committee (September 2020);

Offshore Cape Three Points

- Signing of a Cooperation Agreement with the National Board for Small-Scale Industries (NBSSI), now known as the Ghana Enterprise Agency (GEA), to implement the 'Building Businesses' initiative under the LDPj – CIS Economic Diversification component;
- Signing a Cooperation Agreement with the Ghana Alliance for Clean Cookstoves and Fuels (GHACCO) in November 2020, for the implementation of the Rural Clean Cooking Pilot Project;
- Completion of the Rural Clean Cooking Pilot Project in March 2021 with an Evaluation Report prepared;
- Due diligence note on the Royal Cemetery Fencing project signed in Q4 2020. This project will be financed and implemented under the LDPj-CIS (see Section 12);
- Completion of an agreement with TechnoServe (TNS) to implement the 'Livelihood' initiative under the LDPj – CIS Economic Diversification component; and
- Completion of the extension of the water supply project.

With respect to the 'QIP' components of the (then) CIS both underway since 2018¹⁸, the 2020 AMR and the Q1 2021 QMR record the progress, in monthly reports, on both the water supply (villages of Sanzule [including Anwolakrom]; Krisan and Bakanta) and the educational project (all government schools of Eikwe, Krisan, Sanzule, and Bakanta). Both these two projects are considered in detail in the sections immediately below.

6.5 Community Investment Strategy: QIPs**6.5.1 Water Supply Project**

Recent IESC's monitoring reports have highlighted several difficulties/challenges faced by this project and the community-based Water Board Committee (the 'Committee') which is responsible for managing the project. The key problem was the inability of the Committee to ensure adequate revenue collection. This resulted in an inability of the project to generate a sustainable level of cash flow to maintain and invest in the future development of the project.

In 2020, a decision was made to extend the project (mostly into the 'urban' area of Sanzule and nearby Anwolakrom) to bring water closer to more potential customers and thus generate additional revenue. STEPP Pryme was contracted to undertake the works. While these works were underway, chiefs and elders from the communities agreed to present names to Eni Ghana to reconstitute the Committee. The extension to this project involved a range of activities undertaken by STEPP Pryme, as follows:

- Construction of three new fetching points (one in Anwolakrom and two in Sanzule, at the Palace area and in the area known as Cambodia) making a total of six fetching points;
- Re-development of the existing borehole;
- Refurbishment of existing fetching points;
- Refurbishment at the Water Treatment Facility with installation of a water tank;
- Targeted capacity-building initiatives for the reconstituted Committee;
- Training provided to those individual responsible for collecting the monies paid by customers;
- Rehabilitation of the solar power system and installation of solar batteries with provision of burglar-proof caging (lack of an independent power source has been a significant problem since mid-2019 as power had to be bought from the public electricity supply provider, thus contributing to the project's increased operational costs and the financial challenges faced by the [then] Committee and the project); and

¹⁸ These projects were implemented earlier than the overall LDPj-CIS to provide benefits to the four DAoI villages as soon as possible.

Offshore Cape Three Points

- Maintenance works.

Figure 6-3 and Figure 6-4 show the new Cambodia fetching point and the refurbished Water Treatment Facility. As of end April 2021, the extended water supply project was operational with only minor works to be completed.

The extended project has made potable water relatively easily available to ~5,000 residents of Sanzule (including Awolakrom), Krisan and Bakanta. Also, water is distributed to the Sanzule/Krisan basic school (~130 students). In early February 2021, water tariff collection was resumed. Previously, the government had required the provision of water which was free at the point of source as a contribution to managing COVID-19 (the Water Board Committee was reimbursed by the Government).

Since October 2020; two water quality tests have occurred with the most recent being in May 2021. Both sets of results are accompanied by a statement that, *".....all the parameters determined are within their respective guideline values of drinking water per the sample submitted."*¹⁹ The water is tested against WHO and Ghanaian standards. Having reviewed the May 2021 results, the IESC notes that the standard for phosphate (2.5 mg/l) was exceeded with the measured value being 4.68 mg/l. The previous sample (October 2020) gave a measured value of 0.25 mg/l. It is not possible to know if this an anomaly or a result that may be repeated in the future. The IESC recommends that Eni Ghana organizes a water quality test as soon as possible with results being obtained prior to the handover of the project to the communities. Should the exceedance occur again then Eni Ghana needs to investigate the cause and implement remedial measures. *Post VSV note: the IESC understands the Water Supply Project has been handed over to the Water Board Committee and Eni Ghana no longer has a supervisory role. Eni Ghana should therefore forward the above recommendation to the Water Board Committee and provide assistance commensurate with Eni Ghana's ongoing support role (see below).*

In June 2019, a water quality test gave an exceedance for pH and the laboratory report stated that the water, *"..... is unsuitable for potable use and must undergo further treatment"*. Thus, within the space of almost two years, exceedances of two water quality parameters have been found. Currently, sampling occurs every six months. Given that the project was extended, recently, with an increase in customer use (including a school canteen), it is recommended that the frequency of sampling is increased until water quality is shown to meet, consistently, drinking water standards to ensure that community health is not compromised. Also, Eni Ghana to enter into a discussion with the Committee on how the increased sampling costs will be met and a decision made on the required future sampling frequency once the Committee is confident that water quality meets the required standards.

It has been Eni Ghana's intention, for some time, to exit from the water supply project once the extension is completed and the reconstituted Committee is in place and functioning. The exit strategy involves a handover of the project to the communities with the reconstituted Committee being responsible for operating the project on behalf of the communities. The handover is selected to occur by the end of June 2021. Although Eni Ghana will transfer operational and financial responsibilities to the Committee, it will continue to provide specific kinds of technical/business support to the Committee as/when requested. However, it will have no decision-making powers; for example, the Committee has been considering revenue-generating options to increase income: one such option is to sell water in plastic sachets. The IESC notes that this option, if adopted, may add to the problem of informal disposal of plastic waste in the

¹⁹ The IESC notes that the May 2021 sample shows an elevated phosphate level compared to October 2020 sample, with the May 2021 level being above both the WHO and Ghanaian standard.

Offshore Cape Three Points

communities. However, at the same time it might enhance the Plastic Waste Recycling Project with the sale of an increased volume of plastic for recycling.

Finally, Eni Ghana is in discussion with the Ellembelle District Assembly concerning a waste/sanitation management project. This project would complement and build upon the community health benefits arising from the availability of potable water resulting from the extended water supply project.



6.5.2 Education project

Essentially, the educational project consists of two components:

- Capacity-building for school staff; and
- Improvements to schools and related infrastructure.

The project covers four basic schools (Sanzule/Krisan, Eikwe and Bakanta) and 400 students for the pilot phase and eight basic schools in all 10 communities for the main LDPj-CIS phase (reaching just over 2700 students and 100 teachers). Progress under these two components is considered below. The pilot phase has been extended until end July 2021 due to the various delays experienced by both components.

Capacity-building Component

In its 2019 AMR and Q1/Q2 2020 QMR monitoring report, the IESC noted that COVID-19 had delayed the capacity-building components. Remedial measures were implemented, and Eni Ghana has confirmed that the capacity-building component had caught up with the planned schedule by end 2020. Specifically, five out of six professional development session for teachers (24 teachers and four head teachers) have been completed with the 6th and final session planned to occur soon. In addition, Lead for Ghana (LFG), the implementing contractor, designed four 'capstone' projects aimed at specific schools, such as provision of a community library at the Sanzule/Krisan school (already inaugurated) and is delivering on the three other projects. Finally, the alumni have continued to support the teachers/students in the day-to-day teaching/learning activities.

Offshore Cape Three Points

Support to education will continue post July 2021. The Italian NGO, *Volontariato Internazionale per lo Sviluppo*, has been contracted by Eni Ghana to continue to provide capacity-building support for education within the wider 10 communities targeted by the LDPj-CIS.

Infrastructure Component

The main delay to the infrastructure component resulted from of the time taken to procure a contractor with the capacity and permits to manage the asbestos in the school buildings to be renovated. In Q2 2021, a contract was signed, and work can proceed soon to implement the infrastructure component once the relevant 'asbestos' permits are obtained. A meeting was planned, for the week following the IESC's VSV, with relevant parties, as part of the permit acquisition process. The works are expected to begin in early June 2021 and to be completed by May 2022.

6.6 LDPj-CIS projects

There are 3 initiatives which are described briefly below. Two are being implemented now:

- Rural Clean Cooking Project (under the 'Access to Energy' component); and
- Building businesses (under the 'Economic Diversification' component).

The third initiative focuses on 'Livelihoods' and, also, is implemented under the 'Economic Diversification' component.

6.6.1 Rural Clean Cooking Project

This project is a joint multi-phase project with the World Bank and is implemented by GHACCO. The expected benefits of the project are:

- Improved indoor and outdoor air quality with community health benefits;
- Reduced fuelwood use; and
- Quicker cooking times.

The first phase consisted of a Pilot Project over the period November 2020 to March 2021 with 615 wood-fuelled cookstoves, consisting of three different models, distributed to households in the 10 communities. An evaluation report was prepared and is currently being reviewed. If deemed successful, the Pilot Project will lead to Phase 2 which is the design of a roll-out programme with the aim that 50% of the households in the 10 communities (~2,500 households) use improved cookstoves by the end of the project. Phase 3 will be implementation of the roll-out programme.

6.6.2 Building Businesses

The aim of this initiative is to encourage and support residents in the 10 communities in the establishment of small businesses with a focus on adding value to available raw materials available. Any increase in successful businesses will boost employment opportunities. It is planned that a maximum of 800 individuals (with an emphasis on women and youth) will participate in the initiative. The main support will take the form of a variety of capacity-building activities; however, material support will be provided as necessary on a case-by-case basis. The implementing partner is GEA and a kick-off meeting was held in February 2021 with an introduction of GEA to the communities during the period 15-17 April 2021.

6.6.3 Livelihoods

This project has not yet begun. A Cooperation Agreement is expected to be signed soon with an implementing partner - TNS. The aim of this project is to boost rural agricultural-based livelihoods by enhancing food security and increasing the number of agro-processing businesses.

Offshore Cape Three Points

It is expected that a maximum of 600 individuals will participate. In many ways this project mirrors the Building Businesses initiative. Of note, the IESC was informed that the LDPj-CIS Steering Committee has accepted a proposal from the Sanzule community that Sanzule residents would be given a quota of 30% of the opportunities to participate; the rationale being that Sanzule is the most adversely-affected community in terms of the agricultural base of its economy and, therefore, should be the main beneficiary. The logic of this decision is clear; however, in the IESC's view this decision may pose risks to this project by raising concern amongst members of the other nine communities. It is recommended that Eni Ghana acts to ensure that it is well prepared to manage community concerns, by ensuring that local staff, especially CLOs, are aware of and able to convey the rationale for the Sanzule quota, should these concerns arise.

Eni Ghana is aware of another risk; the project needs to be planned carefully with 'on-time' implementation of key actions. This project is time-bound and agricultural success is dependent on seasonality factors with the appropriate action being taken at the correct time. Should actions/seasons not correlate then the project could fail. The IESC recommends that the SLC department ensures that all other Eni Ghana departments, with a role in delivery of this project, for example, Procurement, are fully aware of this risk and that each of these departments is provided with a schedule of actions and key dates which will act as an 'aide-mémoire' to help ensure 'on-time' delivery of their contributions to the project.

Despite some delays to the QIPs and the LDPj-CIS initiatives (mitigated to some extent by the one-year extension to the LDPj-CIS), these projects are it generally progressing well. The IESC does not have any noteworthy concerns, but has identified some current/future risks.

6.7 Cumulative impacts and DAoI influx

ESAP line 5 states '*Eni Ghana will report on their best efforts to engage other developers, local institutions and government, and other stakeholders in designing coherent management strategies to mitigate cumulative impacts.*'

In this section both cumulative impacts and influx into the DAoI are discussed. Influx is a classic type of cumulative impact in the situation pertaining to the coastal area of the Western Region where oil and gas developments are concentrated.

6.7.1 Cumulative impacts

In previous monitoring reports the IESC has reported Eni Ghana's constraints, acting as a single operator in the region, to effectively influence others/manage cumulative impacts. Consequently, it requested support from the WBG to facilitate the establishment of a multi-stakeholder platform for managing such actions. At this time, most key stakeholders envisaged that the PC would play a key role in both the work to design the multi-stakeholder platform and its activities once in operations. Toward the end of 2018, IFC took the lead and issued a Terms of Reference for a study to design the Ghana Oil and Gas Cumulative Impact Co-Management Platform. Subsequently, Oxford Policy Management (OPM) was appointed to undertake the study.

By early June 2020, OPM concluded its work, with the issue of its draft Final Implementation Study Report. This report followed a range of stakeholder meetings to try to resolve major differences that arose between the key stakeholders, relating to the earlier issue of OPM's draft Inception Report and draft Implementation Report. Key differences such as i) the entities which should be party to the platform and ii) funding of the platform and any resulting management measures, proved to be unresolvable within the context of the OPM design study.

In H2 2020, there were senior personnel changes in the PC; in particular, concerning the Head of the Community Relations (responsible for the multi-stakeholder platform initiative). Also, there

Offshore Cape Three Points

was a general election in early December, followed by a 'transition' period when the new government and personnel 'took stock' and planned future direction and policy. These events acted to delay Eni Ghana from making efforts to encourage the re-start the multi-stakeholder platform initiative. However, on 22 March 2021, Eni Ghana succeeded in arranging a courtesy meeting with the PC's new Head of Community Relations and at the meeting reassured the PC of its commitment to help take the platform forward. At the meeting the Head of Community Relations stated her intention that the PC would communicate, by letter, with all the interested International Oil Companies (IOCs), regarding the platform and the next steps. The IESC was informed that Eni Ghana had received this letter, on 13 April 2021. The letter requested a virtual meeting, with IOCs, on 29 April 2021 to discuss the way forward for creating the platform.

The initiative taken by Eni Ghana has succeeded in re-starting actions leading to creation of the platform. Having succeeded to date, Eni Ghana is continuing in its efforts to ensure that momentum is maintained.

The resolution of the afore mentioned differences, establishment of the Co-Management Platform and its subsequent successes will be the subject of future IESC monitoring effort.

6.7.2 Influx in the DAoI

In the 2019 monitoring report, the IESC describes how Eni Ghana will manage influx in the DAoI in accordance with the adaptive management approach in the production-phase Influx Management Plan. One of the key tasks is to monitor village populations within the DAoI at regular intervals, against a baseline year (2016).

There are two approaches used to derive population figures for each village:

- Using a combination of satellite images and fieldwork, the total number of houses are counted and a multiplier of 4.2 is applied to the number of houses (4.2 is considered by Eni Ghana to be the average size of a household in the DAoI as given by the Ghana Statistical Service in the 2010 Population and Housing Census) to give an estimated population; and
- An interview is held with one member of each household and the respondent is asked to provide the number of household members. This is akin to a census and provides the 'actual' population.

The two results are recorded and compared. The first analysis, undertaken in 2019, showed that the population of Eikwe had increased by a small amount, while the other three villages experienced a decline in population since 2016 with Bakanta showing the greatest reduction (see the IESC's May 2019 Monitoring report). Overall, no sign of influx was detected even though ORF construction work was continuing with project-related employment and economic opportunities in the DAoI still present.

In 2021, the analysis was repeated using the same methodology. Figure 6-5 and Figure 6-6 show the 2021 results ('actual' and estimated populations) against the 2019 results and the 2016 baseline.

The grey bars in both Figures provide the 2021 results. A similar pattern arises from both sets of results ('actual' and estimated) for three of the four villages. The populations of Bakanta and Krisan continue to decline but the decline over the period 2019 to 2021 is small. On the other hand, the population of Eikwe is shown to be continuing to increase. The results for Sanzule are less clear with the estimated population being virtually identical to the 2016 baseline, but showing that the decline between 2016 and 2019 has been reversed; whereas the 'actual' population shows not only that the 2016 to 2019 decline has ceased, but also that there has been a noticeable increase against the 2016 baseline.

Offshore Cape Three Points

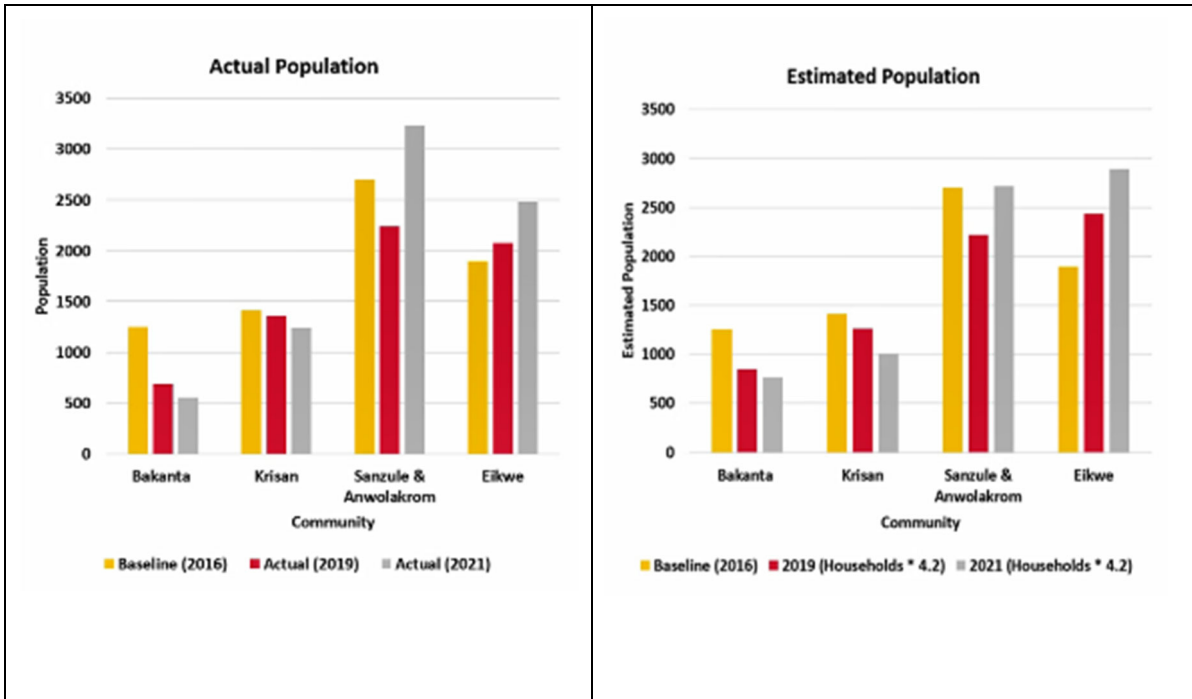


Figure 6-5: DAoI villages – populations ('census') for 2016 ; 2019 and 2021

Figure 6-6: DAoI villages – populations (estimated) for 2016 ; 2019 and 2021

It is possible that the increases in Eikwe and Sanzule, over the period 2019 to 2021, may result in part from households moving from Bakanta and Krisan; however, the reduction in populations in Bakanta and Krisan is too small to account for the scale of the Sanzule and Eikwe increases. As the interviews with the household respondents do not record data on the origin of the respondents (and their family members) it is not possible to be definitive about the extent, if any, of internal migration flows within the DAoI or indeed, migration flows in/out of the DAoI. Overall, as in the case of 2019 analysis, there is no conclusive evidence of influx. As the Project has moved into the production phase the employment and economic opportunities afforded by the Project/construction workforce have reduced, thus making influx less likely compared to the situation in 2019.

The next analysis is expected to occur in 2023 and this future analysis is likely to be able to provide definitive evidence about influx over the eight-year period between 2016 and 2023. It is recommended that the 2023 methodology be adapted to include a question/s about the origin of the respondent and his/her family members. The responses will assist in adding to the credibility of judgements regarding the occurrence (and extent) of influx at the time of the survey and, importantly, in the past.

Also, the next national population and housing census is scheduled to occur in late June 2021. The results should be available by early 2022. The census will provide accurate results on the DAoI villages which, when compared to the Eni Ghana data, will strengthen the conclusion to be reached by Eni Ghana with respect to the occurrence (and extent) of influx not only in the DAoI, but in the wider area.

Offshore Cape Three Points**6.8 Stakeholder engagement**

The OCTP Operations SEP was finalized in June 2019 and is still being implemented. The 2020 AMR (period August to December 2020)²⁰ and Q1 2021 QMR provide embedded copies of documents pertaining to stakeholder engagement events within their respective time periods. An analysis of these documents plus information provided by Eni Ghana personnel for Q2 2021 to date, provides an indicative picture of the relative number of engagement events by topic and by stakeholder type, as follows (where possible and estimate of the number of engagement events is provided):

- Project Lenders (WBG):
 - Meetings on LRP completion strategy;
- Ministries and regulatory/other governmental authorities:
 - Introduction of new Eni Ghana MD and Chairman of the Board (4);
 - Permitting issues; and
 - The multi-stakeholder Ghana Oil and Gas Cumulative Impact Co-Management Platform (1);
- Communities (traditional authorities and leaders plus specially constituted entities such a Steering Committees, Working Groups and the Water Board Committee):
 - Grievances (9);
- Livelihood Restoration (3). Note many meetings have occurred with individual PAPs but these are not included in this section as such meetings occur within the specific context of LRP implementation;
 - LDPj-CIS (18); and
- Plastic waste recycling project (2).

It should be noted that the above items are not a definitive list of all stakeholder engagement events; only those reported in the AMR/QMRs and conveyed to the IESC during the VSV. Nevertheless, the IESC considers that the topics listed, with numbers of meetings, give a credible picture of the key topics being addressed via stakeholder engagement and the types of stakeholders most involved. The analysis shows that most meetings concerned LDPj-CIS activities (28; with the majority of the meetings, focusing on the same topic, being repeated in each of the 10 communities), followed by grievance management (nine) and only three meeting concerning livelihood restoration issues. The low number of livelihood restoration meetings contrasts markedly with the period before July 2020 where the number of livelihood restoration meetings was similar to the number of LDPj-CIS meetings. The imbalance reflects the increase of LDPj-CIS activities and, possibly, the current focus of livelihood restoration activities on assisting PAPs to generate revenues and monitoring/evaluation results in fewer meetings being required (no new implementation phases being required or organizations to be introduced to the community). All meetings are undertaken in line with extant COVID-19 restrictions, resulting in more meetings with community representatives (such as chiefs/elders) and specially constituted bodies such as Steering/Working Groups and Committees. Open 'public' meetings did not occur; unlike in the pre-COVID-19 period.

Eni Ghana operates a Stakeholder Management System (SMS) platform that analyses data on all stakeholder engagement events and maps stakeholders, by category, and presents the results in a matrix (Figure 6-7). The matrix has two axes:

- Stakeholder relevance (1 to 6: low to high relevance for the Project); and

²⁰ The period January to end June 2020 is covered in the IESC's July 2019 AMR and Q1/Q2 2020 QMR Monitoring Report.

Offshore Cape Three Points

- Disposition (positive to negative view of toward the Project).

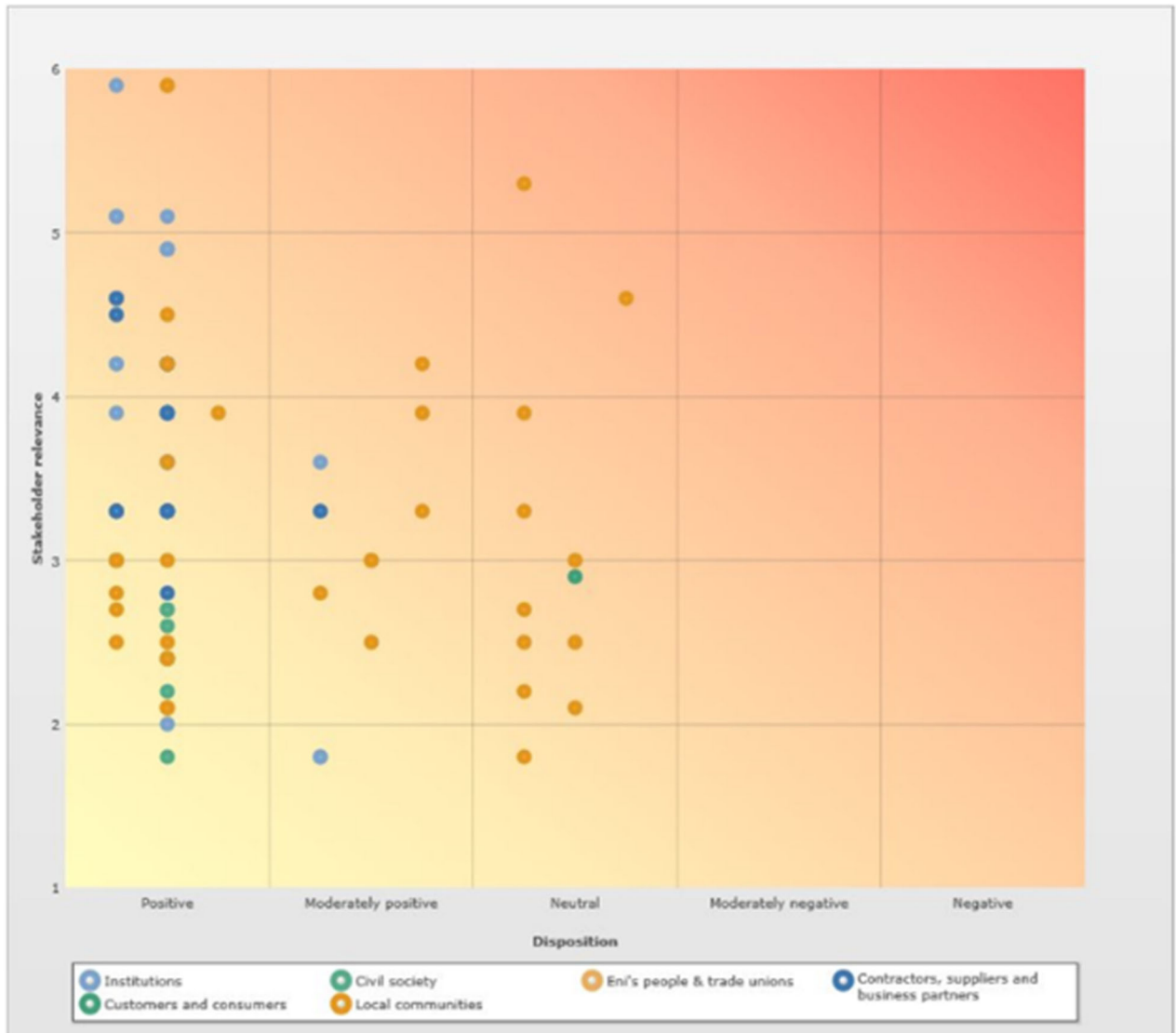


Figure 6-7: Stakeholder 'map' as of end April 2021

From Figure 6-7, it can be seen that, as of end April 2021, there were no stakeholders with a negative disposition toward the Project; although a sizeable number of local community stakeholders are at best 'neutral' or 'moderately positive'; with one community stakeholder with a relevance score between 4 and 5 being close to having a moderately negative disposition toward the Project. Stakeholders with a positive disposition are more varied; including government institutions, those businesses and individuals that interact with the Project commercially, and civil society organizations.

6.9 Community and worker grievance mechanisms

Eni Ghana records and reports community and labour-related grievances together. It operates an approach whereby contractors are expected to manage grievances received from workers or communities and, if resolution proves to be challenging or unsuccessful, grievances are escalated to Eni Ghana. There is now standardization in the way both contractors and Eni Ghana record grievances as all parties use the same register (this was a recommendation in the IESC's 2019 AMR and Q1/Q2 2020 QMR Monitoring Report). Coherence and co-ordination are achieved, also, via training of all contractors on grievance management, regular grievance reporting to Eni Ghana and annual audits of contractor performance.

Offshore Cape Three Points**6.9.1 Implementation of Community Grievance Mechanism**

In 2020, Eni Ghana recorded seven grievances (the same number as in 2019). Three of these grievances were labour-related, three were LRP-related and one was classed as a 'general' grievance. In 2019, there were also three LRP-related grievances, but there were no labour or 'general' grievances (four separate, but linked grievances related to fisheries - see below). All the 2020 grievances were closed out by the end of that year; whereas, the four fisheries-related grievances, of 2019, remained open at the end of 2019 and, indeed, well into 2020.

Of the seven grievances, two of the labour grievances were escalated to Eni Ghana by contractors. Both these grievances originated in changes in working patterns arising from COVID-19 (and very likely would not have occurred if the pandemic had not caused the changes to working practices). The other labour-related grievance concerns the local recruitment procedure; not labour and working conditions of hired workers. It was raised by the Sanzule Recruitment Committee and therefore this grievance is different in kind to the two other labour-related grievances. Of note, the single 'general' grievance involved a grievance raised by a local farmer against an ORF security guard. The security guard had stopped the farmer from burning 'weeds' close to the ORF fence.

In 2021 to date, only one grievance has been registered by Eni Ghana. It is a labour-related grievance escalated by a contractor which, as in the case of two of the 2020 labour-related grievances has its origins in the COVID-19 pandemic. As of mid-May 2021, this grievance remained open (it was registered on 27 January 2021). The IESC considers that the continuing receipt of a relatively low number of grievances reflects the fact that the Project is operational and employs few workers and has fewer activities that are likely to cause grievances to be submitted. In addition, as indicated elsewhere in this report, the ORF is a well-managed project and this is likely to be contributing factor.

In 2020, the time taken by Eni Ghana to close a grievance varied between 86 days (LRP-related) and 2 days (labour-related). Five of the 7 grievance were closed out in under 30 days. For contractors, 1 grievance took 48 days to close out, while the other grievances were all closed out in under 20 days.

In previous monitoring reports, the IESC highlighted its concerns about the length of time taken to close out the four fisheries-related grievances concerning, primarily, alleged damage to fishing gear from an unrecovered anchor. In the 2020 AMR (see Table entitled 'Update on 2019 FMP Grievances'; pages 25 and 26) it is stated that, "...the FMCC urged the fishing companies to close out their grievance and consult the FMCC if they have further concerns. All the related fishing companies in the meeting agreed to close out their grievance." The table entry ends with "Closed 21/12/2020." The IESC examined three of the four close-out forms which confirm, via complainant and Eni Ghana signatures, that 'close-out' occurred on that date. However, Annex C of the close-out form show that the complainants were satisfied with the grievance management procedure but did not accept the outcome. All three complainants added that they were, "...not satisfied with the outcome but await Eni Ghana's response to the letter from the FMCC". Despite, the lack of satisfaction, on the part of the complainants, with the outcome and the potential for further discussion on the grievances to occur, the 2019 grievances are closed out and there are now no long-standing grievances that remain open.

In the IESC's 2019 AMR and Q1/Q2 2020 QMR Monitoring Report, it is mentioned that TNS registered 40 grievances in 2019. There followed a dramatic decline in grievances with only two grievances registered for 2020. Both grievances were closed at the end of 2020. Eni Ghana considers that this decline is due to the imminent closure of the LRP; plus in the IESC's view, the completion of the options and resolution of previous problems such as responsibilities for managing options and the desire of some PAPs to change options.

Offshore Cape Three Points

The increase in LDPj-CIS activities to the 10 communities brings implications for grievance management, as more people/groups can submit grievances, which has resulted in Eni Ghana taking action to ensure that the Grievance Mechanism continues to operate effectively. First, a reconstituted Grievance Management Committee has been formed, with representatives from all 10 communities. Secondly, Eni Ghana has undertaken capacity-building to ensure that the Committee is fully aware of the grievance management procedure and, also, its roles and responsibilities in assisting resolution and eventual close-out of grievances. Training for all LDPj-CIS contractors also is necessary with three contractors trained and another two contractors to be trained soon. Finally, as part of the roll-out of the grievance management procedure to the six non-DAoI communities of Atuabo, Anokyi, Asemnda, Baku, Ngalekye and Ngalekpole; work is underway to place grievance boxes and erect appropriate explanatory signage in widely-used public spaces in these communities.

6.10 Emergency Response Planning

Eni Ghana has a 4-year programme for emergency response exercises²¹, conducting either table-top exercises (no deployment of equipment) or full-scale exercises (with deployment of equipment). The drill scenarios will vary on each occasion, depending on the nature of Eni Ghana’s activities/the perceived risks at the time of each exercise. Emergency scenarios often include multiple events/response options, for example and incident requiring both injuries (medivac) and oil spill response/fire.

The AMR template (including the recently proposed and approved updated template) prescribes mandatory requirements for oil spill response drills/exercises, including one drill per year with equipment deployment (Figure 6-8), however no drills were performed during 2020 or Q1 2021. Furthermore, the drill scenarios in the 4-year programme will not necessarily include oil spill scenarios.

Oil Spill Response training for this reporting period

Activities	Mandatory Frequency	Date(s) Performed	Observed Deficiencies ¹⁵	Corrective Actions and Schedule For Implementation ¹⁶
Drills without equipment deployment	Minimum: three (3)/year	<i>None</i>		
Equipment deployment drills.	Minimum: one (1)/year	<i>None</i>		

Figure 6-8. Extract from the AMR template indicating spill exercise frequency

The IESC understands COVID-19 restrictions prevented any full-scale exercise in 2020. Whereas the IESC accepts the constraints associated with COVID-19 travel restrictions, it questions why table-top exercises were not conducted.

The IESC was further informed that a Level 3 exercise is scheduled for late Q2, 2021²². The exercise will include oil spill response and medivac activation on the Saipem 10000 drill ship, whilst drilling in Ivory Coast waters. Oil spill equipment is maintained at Takoradi logistics base and an OSRL employee is seconded to Ghana on a rotational basis.

²¹ Emergency Response Plan, Emergency drill 4Y plan. Ref. plan ms hse 002 eni ghana r17

²² Emergency Response Exercise Plan – Full Scale 3rd Level Emergency Drill – Saipem 10K.

Offshore Cape Three Points


The IESC welcomes the upcoming full-scale exercise. However, it notes the apparent discrepancy between the wording of the AMR template and Eni Ghana’s schedule for emergency response exercises. The discrepancy should be discussed with the WBG and consistency achieved between the AMR and Eni Ghana’s schedule for emergency response planning (inclusive of oil spill exercises).

6.11 Management of Change

The 2020 AMR reported one Management of Change (MoC) request concerning the anticipated slowdown in activities under the LDPj – CIS as a result of COVID-19 restrictions. In addition, in Q1 2021 QMR a MoC notification was sent to WBG in relation to the extension of LRP implementation from January 2021 to July 2021.

Eni Ghana operates a MoC procedure which is aligned with the process outline in Section 11.5 of the Environmental, Social and Health Management Plan (EHSMP)²³. The EHSMP describes the types of changes that trigger change requests, including temporary or permanent alteration (physical/procedural) that deviates from the original design, assets, systems, processes, operations, products, organization and personnel. Requirements for the reporting and notification of changes, depending on the categorisation of potential risks associated with any change, is also detailed in the ESHMP. The IESC makes two observations relating to MoC application:

1. The ESHMP refers to Eni Ghana’s HSE Management of Change Procedure (HSE PRO 017.00). The MoC Procedure was revised in April 2021 and reviewed by the IESC during the VSV. Of note, the Procedure does not provide any linkages with Section 11.5 of the ESHMP, nor does it include requirements for notification of changes to the WBG. Consequently, there is a risk that requirements for the notification of the WBG might be overlooked when following the MoC Procedure. As a minimum, the MoC procedure should cross reference Section 11.5 of the ESHMP, or preferably duplicate specific elements in the ESHMP, including notification requirements.
2. The IESC was shown the current MoC register (Figure 6-9), which shows two change requests made in 2019 and 2020. The register does not include changes relating to the SLC activities described above and it is therefore unclear whether the SLC team is following a separate MoC procedure. Consistency between the SLC and HSE Departments’ Management of Change procedure(s) should be confirmed by Eni Ghana.



MoC Register

Tracking Number	Initiation Date	Originator	Position	Department	Change Owner	Closeout Date
2019-001	6/Nov/19	Giuseppe Pugliese	Plant Manager	Production	Sebastiano Segantini	
2020-002	27/Nov/20	Matteo Ghiraldini	Maintenance Supervisor	Maintenance	Giacomo Corcela	

Figure 6-9. Extract from the Management of Change Register

The IESC was made aware of the upcoming conversion of the GI-3 well and considers the arrival of a new drillship and conversion of an existing well to represent a ‘change’. As such the IESC understands the well conversion will be subject to the MoC Procedure and the E&S risks categorised accordingly. Depending on the categorisation of risk, the WBG might need to be formally notified in accordance with the MoC Procedure, and in this case, regardless of risk

²³ Plan ms hse 009 Eni Ghana – Environmental, Social and Health Management Plan. August 2019 Rev 05.

Offshore Cape Three Points

categorisation, WBG has requested relevant E&S risk assessment(s). Noting the drilling activities within the OCTP block are scheduled for September 2021, the IESC understands the MoC Procedure will be applied prior to this timeframe (and indeed much of the risk assessment effort required to determine the level of E&S risk is ongoing).

6.12 Closure of earlier IESC findings

The IESC's November 2020 desk top review of the 2019 AMR and Q1, Q2 2020 QMRs identified 15 findings, many of which had recommended corrective actions. Where possible the IESC has revisited these findings within this report and described progress made towards the closure of earlier findings. Of the 15 findings made, 9 have been closed with work towards closure of the remaining findings in progress.

The 'open' issues identified in the previous (pre-November 2020) monitoring visits are tabulated in Appendix 4 with an indication of the current status of each issue provided by the IESC following this May 2021 virtual site visit. Previously 'closed' items have been removed from Appendix 4.

The IESC has been unable to revisit certain findings, in part because it has been unable to revisit Project facilities.

Offshore Cape Three Points

Table 6-1: Summary of Findings, PS1

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
001_5/21	Permits	The renewal of certain permits is outstanding. These include the permit from the GMA for the establishment of offshore exclusion zones and a production permit (oil phase and gas phase) from the PC.	PS1	Although this is not having an impact of operations, Eni Ghana should use reasonable efforts to liaise with issuing authorities in order to expedite the issue of permits, or receive confirmation in writing that Eni Ghana can continue to operate/permits are not required (where issuing authorities are slow to issue permits without reason).	Minor (Q2/Q3, 2021)
002_5/21	Well conversion	Work is currently underway to prepare documentation for the forthcoming conversion of well GI-3. Care is needed to ensure commitments made by Eni Ghana during previous drilling campaigns are reinstated for future drilling/well workover activities.	PS1 and ESAP	Preparation of updated documentation is required with specific references to WBG Performance Standards (for example, in the Bridging Document for GI-3) and applicable environmental management plans in addition to the Waste Management Plan. Specific management plans, or elements therein for consideration should include <i>inter alia</i> : <ul style="list-style-type: none"> • Marine Traffic Management Plan; • Marine mammals and sea turtle protection policy (with respect to underwater noise); • Well Control Emergency Response Plans (as per ESAP item #3); and • Environmental monitoring and reporting. Any applicable Eni Ghana management plans necessary to supplement Saipem's MS should be provided to Saipem.	Minor (prior to future drilling)

Offshore Cape Three Points

003_5/21	Audit Programme – waste service provider	IESC notes that three corrective actions identified during the 2017 audit of Zoil, including one major non-conformity relating to the storage area of Oil Based Muds (OBMs), have not been closed (or have been reopened).	PS1 and PS3	Eni Ghana should follow up on significant 'open' actions on a regular basis and consider alternative disposal options for any future OBMs until the audit action is closed and it is satisfied with the OBM storage arrangements offered by Zoil.	Minor (quarterly until resolved)
004_05/21	Water Supply Project – Water Quality	The IESC notes that the water quality test results for May 2021 show that the standard for phosphate (2.5 mg/l) was exceeded with the measured value being 4.68 mg/l. It is not possible to know if this an anomaly or a result that may be repeated in the future.	PS1 and PS4	Eni Ghana to organize a repeat water quality test as soon as possible with results being obtained prior to the handover of the water supply project to the communities. Should the exceedance occur again then Eni Ghana needs to investigate the cause and implement remedial measures <i>Post VSV note: the IESC understands the Water Supply Project has been handed over to the Water Board Committee and Eni Ghana no longer has a supervisory role. Eni Ghana should therefore forward the above recommendation to the Water Board Committee and provide assistance commensurate with Eni Ghana's ongoing support role.</i>	Minor (within 1 month of this report)
005_05/21	Water Supply Project – Water Quality	Within the space of almost two years, exceedances of two water quality parameters have been found. Currently, sampling occurs every 6 months. The water supply project was extended, recently, with an increase in customer use (including a school canteen).	PS1 and PS4	The frequency of sampling should be increased until water quality is shown to meet, consistently, drinking water quality standards. Eni Ghana to forward this recommendation to the Water Board Committee and enter into a discussion with the Water Board Committee to reach agreement on how the increased sampling costs will be met and a decision made on the future required sampling frequency once the Committee is confident that water quality meets the required standards.	Moderate (increase frequency in Q3, 2021)

Offshore Cape Three Points

006_ 05/21	LDPj-CIS- Livelihoods Project	This project is time-bound and agricultural success is dependent on seasonality factors with the appropriate action being taken at the correct time. Should actions/seasons not correlate then the initiative could fail.	PS1	Eni Ghana (SLC department) to ensure that all other Eni Ghana departments, with a role in delivery of this project, are fully aware of this risk and that each of these departments is provided with a schedule of actions and key dates which will act as an 'aide-mémoire' to help ensure 'on-time' delivery of their contribution to the project.	Minor (Q3, 2021)
007_ 05/21	Influx	The current approaches to estimating the DAoI village populations do not provide data on the origin of residents. Therefore, it is not possible to analyse migration flows within the DAoI and in/out of the DAoI.	PS1	Eni Ghana to adapt the methodology to be used in the 2023 influx study to include a question/s about the origin of the respondent and his/her family members.	Minor (by end 2022)
008_ 05/21	Emergency Response Planning	There is a discrepancy between the wording of the AMR template and Eni Ghana's schedule for emergency response planning (inclusive of oil spill exercises); AMR the template requires three desktop and one full-scale oil spill response exercises per year.	PS1	The discrepancy should be resolved with the WBG and consistency between the AMR and Eni Ghana's schedule for emergency response planning (inclusive of oil spill exercises).	Minor (Q3, 2021)
009_ 05/21	Management of Change	Eni Ghana's HSE Management of Change Procedure (HSE PRO 017.00) does not provide any linkages with Section 11.5 of the ESHMP (MoC section), nor does it specify requirements for notification of changes to the WBG. Consequently, there is a risk that notification requirements to the WBG might be overlooked when following the Procedure. The IESC was shown the current MoC register, which listed two change requests from 2019 and 2020. The register does not include changes relating to the SLC activities and it is therefore unclear whether the SLC team is following a separate MoC procedure.	PS1	As a minimum, the MoC procedure should cross- refer to Section 11.5 of the ESHMP, or preferably duplicate specific elements in the ESHMP, including notification requirements. Consistency between SLC and HSE Departments Management of Change procedure(s) should be confirmed/ensured by Eni Ghana.	Minor (Q3, 2021 and in no event later than start of drilling for GI-3)

Offshore Cape Three Points

		<p>The IESC understands the future well conversion (GI-3) will be subject to the MoC Procedure.</p>		<p>Eni Ghana to provide relevant MoC documentation, including E&S risk assessment(s), as per WBG's request.</p>	
--	--	---	--	---	--

7. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

7.1 Introduction

This section covers the following topics:

- Demobilisation of workers; and
- Occupational Health and Safety.

7.2 Demobilisation of workers

There are no significant demobilisations of workers in the period covered by this report. Large-scale demobilisation was underway in Q3/Q4 2018 and continued into 2019. In early 2019, 460 of the demobilised workers were from the DAoI communities. Eni Ghana prepared a Demobilisation Plan to manage the process and one of the actions was to monitor the re-integration of DAoI workers into the local economy.

7.2.1 Demobilised DAoI workers and re-integration into the local economy

In its May 2019 monitoring report, the IESC reported the results from a survey (March 2019), of 112 (from a target sample of 120) of 496 demobilised DAoI workers. The target of 120 was based on a sample of 30 from each of the 4 communities. Subsequently, and following IESC comments on the sample; the sample was increased to 200 (effectively reducing the error margin from 8% to just above 5% at a 95% confidence level, thus giving results that are more accurate). The revised results were presented to the IESC during the VSV and a summary is provided below.

Figure 7-1 shows a close correlation between before/after livelihoods showing that most workers were able to resume their previous livelihoods. There are a few interesting features. First, those with no work increased by 28% (from 39 to 50) which is perhaps unsurprising. Secondly, those practising various forms of artisanship fell by 35% (from 48 to 31) which may be considered surprising as some of skills gained working at the ORF might be suitable to artisanal-type livelihoods. It is possible that some of those who might have returned to artisanship found employment elsewhere via the contractor which employed them at the ORF thus reducing the number available to return to artisanship. Three livelihoods experienced an increase: farming, fishing and formal employment.

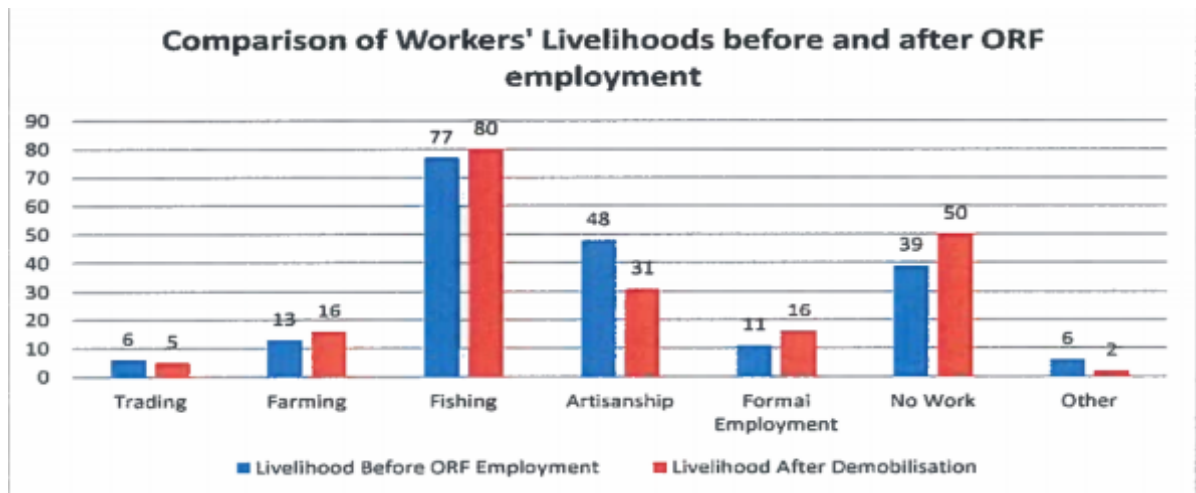
Offshore Cape Three Points

Figure 7-1: DAoI Workers: Comparison of Livelihoods before/after ORF employment

During the May 2019 site visit, the IESC was informed that Eni Ghana intended to repeat this survey, which the IESC strongly supported as the data will be useful not only to evaluate the extent of worker re-integration into the local economy but also for a range of Project-related initiatives, particularly LDPj- CIS implementation. Due to unforeseen circumstances, particularly COVID-19 restrictions, Eni Ghana did not repeat the survey in 2020. Therefore, the IESC recommends that Eni Ghana repeat the survey by end of 2021, if circumstances allow it to be undertaken safely.

7.3 Occupational health and safety

7.3.1 H&S Performance

Eni Ghana continues to implement robust HSE and SLC Management Systems working closely with its contractors where necessary to ensure a consistent approach and standard of H&S management across of the Project. There is a strong H&S culture which is reflected in positive Project H&S metrics. The strong performance is clearly demonstrated by Figure 7-2 which shows zero Total Recordable Incidents (Fatalities, Lost Time Incidents, Restricted workday and Medical treatment cases) for 2020 and 2021 year-to-date, which compares favourably with industry standards²⁴. The IESC further notes the transition to the Production Phase results in fewer contracted (construction) workers, further reducing total hours worked per annum and thus reducing the Project's risk profile.

²⁴ IOGP safety performance indicators for reporting companies in 2018 indicate 1 TRIR/one million hours worked. Ref. IOGP Safety Performance Indicators - 2018 data.

Offshore Cape Three Points

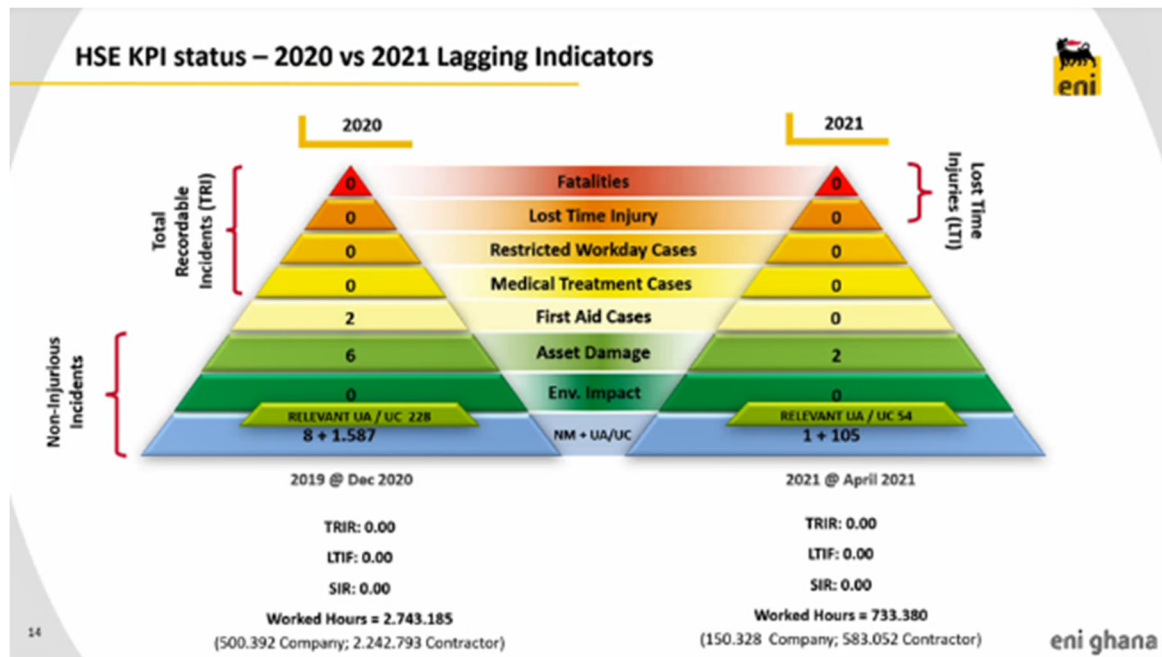


Figure 7-2: Key HSE Key Performance Indicators for 2020 and 2021²⁵

7.3.2 HSE training and initiatives

Multiple training programmes and ways of working are ingrained in Eni Ghana's operations (induction and refresher training, toolbox talks, job safety analyses and permits to work etc.). Each year a training matrix is produced based on a Needs Analysis. The Needs Analysis considers minimum requirements, specific job roles, refresher training (as certificates expire) and *ad hoc* training needs as roles and responsibilities evolve. The IESC has seen the 2021 training matrix, notes the allocation of specific training courses to individuals and overall considers training to be well managed. Contractors are required to develop their own training matrices and provide evidence (certificates where applicable) of trainings completed.

Several training programmes and initiatives are ongoing at the time of reporting. Currently, Eni Ghana has two external training providers and, also, draws upon training from its Headquarters in Milan. Safety coaching, provided by an external consultancy, has been in place since March 2021, following an initial delay because of COVID-19 travel constraints. This activity involves approximately seven days of coaching in which the coach discusses and evaluates a trainee's approach in different scenarios i.e. an interactive session design to explore decision making and human behaviours.

Other recent training initiatives include:

- Ongoing implementation of a Contractor Safety Management Tool (CSMT) which includes management of resources, for example, status of training certificates/expiry dates etc;
- Roll out of an electronic Permit to Work system (E-PTW), similar to the E-PTW used by Yinson on the FPSO, expected to fully replace the paper-based system by the end 2021; and
- 'Pact for Safety', an initiative rolled out in 2020 to Eni Ghana's SPIE and BajFreight contractors. The initiative involves a 'commitment to safety' from contractors. Safety inspections and monitoring are central to the Pact with points awarded/deducted for good/poor behaviours and reflected in a Safety Performance Index (SPI). In this way, the

²⁵ NM + UA/UC refers to Near Misses plus Unsafe Acts/unsafe conditions. Relevant refers to those deemed to present an actual potential risk of incident.

Offshore Cape Three Points

SPI is monitored monthly with good performance rewarded or poor performance identified and used as a trigger for interventions (e.g. refresher training) where necessary.

It is the IESC's opinion that there remains a strong H&S culture within Eni Ghana which is cascaded to its main contractors. This is exemplified by the well-established 'Stop Work Authority', exercised 67 times in 2021 year-to-date, that allows anybody working on the Project to stop work where conditions are thought to be unsafe.

7.3.3 COVID-19 protocols

National restrictions are in place that limit social gatherings and require social distancing and use of face masks in certain situations, however they are generally not very stringent. There is also a 7-day mandatory quarantine period for arrivals to Ghana if they test positive (if tests are negative, there is no requirement to quarantine). Eni Ghana complies with national requirements and has supplemented these with its own protocols as set out in its Pandemic Preparedness and Response Plan which was last updated in March 2021. These more stringent requirements include:

- A mandatory 14-day quarantine period when entering Eni Ghana sites with tests on day 1, 7 and 12. Typically new arrivals are required to stay in Eni Ghana's apartments in Accra to avoid single rooms in hotels which would be more likely to adversely affect the mental wellbeing of those in quarantine;
- If tested to be COVID-19 negative after this period new arrivals to Ghana will be issued with medical certificate of clearance and allowed to leave quarantine; and
- Once on site, all new arrivals get a 'new arrival' badge. New arrivals should endeavour to continue self-isolation practices (partial separation from others, eating separately etc.) as an additional precaution in case they contracted COVID-19 during transit to site. This latter measure is in recognition that individuals may be exposed to COVID-19 when transiting between the quarantine apartment and the site, especially when required to congregate in airport waiting rooms (if going offshore). More recently, Eni Ghana has been able to arrange for segregated waiting areas for those travelling to the FPSO.

When SLC team members engage with communities, they consult with the health department to agree health protocols. Communities are also given health inductions and provision of PPE (if working on a community project with Eni Ghana). In some circumstances, projects (participation of certain individuals) have reportedly been put on hold.

7.3.4 Incidence of COVID-19

A total of 139 cases have been reported for the Project since the start of the pandemic. Of these, 70 involved Eni Ghana employees and their families and 67 contracted workers or their families. To date, 136 have fully recovered but, sadly, 2 have died.

The first case on the FPSO was recorded in early 2021 and resulted in 23 positive results on board. Eni Ghana responded with mass testing and evacuation of individuals testing positive. At the ORF a single case was recorded during the VSV. Mass testing at the ORF had commenced at the time of the VSV, but the outcome of the tests was unknown.

Eni Ghana's medical practitioner recognises the potential harm on mental wellbeing associated with the pandemic, particular for those isolating or affected directly by the pandemic. In addition to quarantine apartments mentioned above, currently-affected parties have access to psychologists 'on demand' via the medical provider. Eni Ghana is looking further into ways it can support workers' mental wellbeing, including proactively providing psychological support rather

Offshore Cape Three Points

than on demand. The IESC supports the idea of proactive mental-wellbeing assistance, including counselling service, and will revisit this issue during the next monitoring visit.

Offshore Cape Three Points**Table 7-1: Summary of Findings, PS2**

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
010_5/21	Demobilisation of DAoI workers	During the May 2019 site visit, the IESC was informed that Eni Ghana intended to repeat its 2019 survey of DAoI workers and their re-integration into the local economy. Due to unforeseen circumstances, particularly COVID-19 restrictions, Eni Ghana did not repeat the survey in 2020.	PS2	Eni Ghana to repeat the survey.	Minor (by end 2021)

Offshore Cape Three Points

8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

This section considers the management and monitoring of key environmental impacts associated with the Project and the Project's commitments to the prevention of pollution and promotion of resource efficiency. Key aspects relevant to the Project include:

- Offshore environmental monitoring
- Surface water;
- Wastewater effluent;
- Groundwater;
- Air quality (including stack emissions);
- Noise;
- Waste management; and
- Greenhouse gas emissions.

8.1 Offshore monitoring campaign

Eni Ghana has been performing a series of biennial offshore monitoring campaigns with previous campaigns undertaken in 2017 and late 2018. Both these campaigns have been led by the specialist oceanographic survey company, Tecnoambiente based in Spain, with support from ESL.

Consistent with the intended schedule, the next campaign is scheduled for mid-2021, however Tecnoambiente will not participate. Instead, ESL will lead the survey campaign, using a survey vessel chartered by Eni Ghana. ESL is due to present details of its proposed sampling campaign in June 2021 although it is understood that the intention is to duplicate the previous sampling campaigns. ESL will also inspect the vessel chartered by Eni Ghana to ensure its suitability for an environmental monitoring survey. Contracts with laboratories have not been secured; however, it is understood accredited laboratories will be sourced.

8.2 Onshore Monitoring

8.2.1 Surface water

Since June 2020, ESL has been undertaking a quarterly monitoring programme, sampling from the same locations used during the construction phase. The sampling programme meets with the requirements specified in the Onshore Environmental Monitoring Programme for Production Phase of OCTP Phase 2 (prg ms hse 011 eni ghana r00).

Key survey findings include:

- Reduced water flow at sampling location SW05 (to the north of the ORF site close to tie in with GNGC pipeline), in part because of erosion induced blockages. Such barriers to flow have reportedly been rectified and ESL has verbally confirmed no blockages or restricted flow due to blocked culverts. Similarly, the IESC was informed that ESL has not found any evidence of habitat degradation caused by hydrological changes²⁶, and confirmed this risk was indeed a key concern and focus of its monitoring efforts.
- High turbidity values were recorded at sampling location SW04, close to the Permanent Accommodation Camp (PAC). The IESC was informed that the high turbidity levels in surface waters resulted from construction work at the PAC and was addressed at the time by the implementation of enhanced erosion control measures. The PAC has since been completed

²⁶ Five water gauges are used to monitor long term fluctuations in surface water/swamp water levels.

Offshore Cape Three Points

and runoff/sedimentation associated with earth works/construction has since ceased (see Figure 8-1).

With the cessation of construction activities, the occurrence of further erosion and sedimentation is less likely. However, in the event high turbidity levels are recorded in surface water, the source of the turbidity should be investigated and actions taken to remediate where necessary.

8.2.2 Waste-water effluent

The 2020 AMR records exceedances of Project Standards for certain parameters in the treated sewage effluent discharge at the pilot camp and PAC: specifically, total suspended solids, total nitrogen and total phosphorus in Q2 and Q4 2020. The IESC was further informed that E Coli levels exceeded applicable Project Standards, although this parameter is not reported in the 2020 AMR. Microbiological parameters, including total Coliforms and E Coli levels are reported in the Q1 2021 QMR, with clear exceedances apparent.

The exceedances are attributed to faulty sewage treatment plants (both at the pilot camp and PAC). Following the detection of non-compliant discharges, Eni Ghana halted the discharge of treated wastewater to a soakaway and instead the effluent is collected by Eni Ghana's Waste Contractor for treatment via a municipal treatment works.

The IESC understands new parts have been ordered for the repair of the sewage treatment plants. In the interim, Eni Ghana has committed to continue with the collection and offsite treatment of sewage effluent.



Figure 8-1: Pilot camp (left) and fully constructed Permanent Accommodation Camp (right)

8.2.3 Groundwater monitoring

ESL continues to perform groundwater monitoring in line with the onshore monitoring programme. Low pH values have been reported, however similar low pH values are recorded in baseline samples, indicating that the low pH is due to natural geology rather than being project induced.

Offshore Cape Three Points**8.3 Air quality****8.3.1 Ambient air quality**

In 2020, the ambient air quality monitoring programme was revised to exclude sampling at the helipad and pipeline areas. Whereas the IESC does not have a concern with an adaptive approach to sampling frequency and locations, any changes to the sampling programme (or management plans in general) should be agreed with the WBG. At the time of the VSV, WBG representatives did not recall such an agreement. The IESC therefore recommends that agreement with the WBG should be confirmed. In the event such agreement was not reached prior to the changes, Eni Ghana should retrospectively agree this change. The changes appear to be minor and justifiable, but nevertheless, as a matter of process, changes to the Environmental Monitoring Programme must be agreed with the WBG.

Elsewhere all ambient air quality parameters are reported to be below Project Standards with the exception of SO₂. The relatively high concentrations of SO₂ have been highlighted in previous reports and can be attributed to non-project sources, such as village fires for cooking and local vehicle movements. ESL also identifies Project stack emission as a potential contributor. Whereas the IESC does not envisage significant SO₂ emissions from the Project (due to the low sulphur content in the gas) it nevertheless supports direct stack emission measurements (see below) to confirm they are a minor contributor to ambient SO₂ concentrations.

8.3.2 Stack Emissions

Stack emission monitoring of power generating units and compressors was planned for September 2020. However, following a review of proposed sampling, Eni Ghana assessed the safety risk to be unacceptable, due to the high temperatures of emissions (500 to 650°C) and the height of the stack sampling ports. The IESC has been informed that Eni Ghana has already installed a Continuous Emissions Monitoring System (CEMS) and that its intention is to commission the CEMS instead of taking stack emission samples. Commissioning of the CEMS will coincide with a planned shutdown of the ORF, which is scheduled before the end of 2021.

The IESC recognises the use of CEMS as a safer alternative; however, strongly recommends that a robust calibration is performed to ensure data generated by the CEMS is accurate and reliable in the absence of the originally envisaged stack emissions sampling. The CEMS should be configured and calibrated to allow recording and reporting of daily averages, under temperature and oxygen conditions required in the WBG EHS guidelines.

8.4 Noise

Noise measurements presented in the 2020 AMR were reviewed during the VSV. Eni Ghana concludes that all noise levels are below applicable Project Standards; however, the IESC notes that the standard applied to the PAC is the Ghana and WBG standard for Industrial/Commercial Receptors (70dB(A)) for both night-time and day-time. The industrial standard has been selected by Eni Ghana on the basis that the PAC sits within the ORF site, however, the IESC would question the appropriateness of the industrial/commercial standard when the PAC is intended to provide restful residential accommodation.

Noise levels at the PAC are approximately 65dB(A) during the day-time and therefore below the industrial limit. However, if WBG residential limits of 55 and 45 dB(A) for day and night-time respectively were to be applied, such noise limits would be exceeded.

It is the opinion of the IESC that residential limits are the most appropriate for the PAC; however, the appropriate Project Standard for the PAC should be agreed with the WBG. Regardless of the applicable limit agreed with the WBG, the IESC further recommends a review of the sampling locations to ensure appropriate locations have been selected. This recommendation is prompted

Offshore Cape Three Points

by the understanding that current sampling locations are near outdoor noise sources, for example, freezer fans/air conditioning units. In the event application of the residential standard is confirmed by the WBG it is recommended noise levels are measured at the façade of residential buildings as these areas are less likely to be affected by freezer fans and other outdoor noise sources within the PAC area. Eni Ghana should also measure indoor noise to confirm restful conditions inside the accommodation.

The IESC does not anticipate noise at the PAC to originate from the ORF plant because the ORF is located a significant distance from the PAC and also because noise levels measured at the ORF plant are lower than the PAC (Figure 3-2).

8.4.1 Waste management

Eni Ghana continues to operate in accordance with the Waste Management Plan (WMP) dated 30 September 2018. The WMP was updated as part of operational readiness planning in 2018; however, continues to include measures for the management of drilling wastes.

The 2020 AMR names Zoil as the primary waste contractor for the Project. Eni Ghana currently has two waste contractors, Zoil and ZEAL. Most wastes are managed by Zoil, particularly onshore wastes. Yinson, the operator of the FPSO, uses ZEAL. Both are approved by Eni Ghana and it is at the discretion of main contractors which one they use.

Zoil was audited by Eni Ghana on April 2021, and previously in 2017; see recommendations in Section 6.3.3. In addition to the comments in Section 6.3.3, the IESC makes two further observations:

1. The Anaerobic Thermal Desorption Unit (ATDU), used for the treatment of OBMs and drill cuttings, was found to be not working in April 2021. The ATDU is identified for repair once COVID-19 travel restrictions permit, and in the interim Eni Ghana has informed the IESC that Zoil has an alternative treatment method for cuttings; a Vertical Cutting Drier (VCD). As a further back-up, OBMs and cuttings can also be treated by ZEAL should it be required.
2. The Q1 QMR showed that ZEAL's EPA permit was due to expire in April 2021. The IESC can confirm that this permit has been renewed for a further 12 months.

8.5 Greenhouse gas emissions (GHG)

The reporting of GHG emissions and the identification of areas of improvement and GHG emission reduction, is a requirement of the ESAP (Item 8). Eni Ghana has also committed to implement a Zero-Permanent Flaring policy and will implement measures for minimization of venting and flaring (consistent with the Global Gas Flaring and Venting Reduction Voluntary Standard) and minimization of fugitive emissions.

The process for GHG Emission accounting, as presented in Plan ms hse 021 Eni Ghana – GHG Accounting and Reduction Program, 25 October 2017 using bespoke software (SHERPA), was described in the previous IESC Monitoring Reports and is not duplicated here. The following sections therefore focus on GHG emissions targets and recent initiatives implemented by Eni Ghana to reduce GHG emissions.

For 2020, the AMR reports no flaring events during normal operating conditions.

8.5.1 Targets

There are main two areas where Eni Ghana has potential to control and reduce GHG emissions: i) flaring and ii) fugitive emissions.

Offshore Cape Three Points

Eni Ghana is set targets to reduce total GHG emissions as a part of Eni’s global goal for GHG emissions reductions. In 2020, emissions were lower than in 2019, falling to 13.09 tCO₂/kboe (exceeding the target reduction). This was in part due to the COVID-19 related postponement of certain maintenance activities that will result in shut down/flaring. However, in 2021 GHG emissions are expected to increase as these postponed activities are rescheduled. Such activities include, *inter alia*: acid stimulation of wells (April 2021); FPSO shut down (early 2021); and replacement of compressor valves. In 2022, following the catch up programme of maintenance activities, targets will fall (Figure 8-2) and be more in line with pre COVID-19 levels.

Where possible, Eni Ghana will attempt to schedule maintenance activities to coincide in order to reduce flaring events, not only to reduce GHG emissions, but also for commercial reasons. However, the IESC was informed that maintenance activities planned for 2021 cannot be scheduled to coincide and thereby reduce the volume of gas flared.

GHG 4YP 2021 – 2025 + GI-3 ST

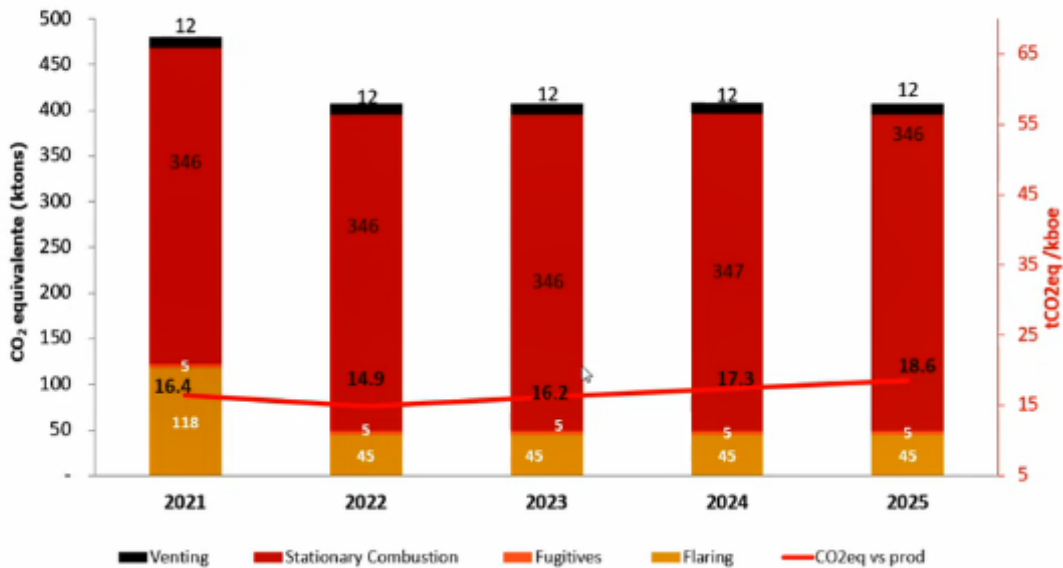


Figure 8-2: Four-year targets for GHG emissions (tCO₂eq/kboe)

8.5.2 Initiatives to reduce GHG

Although fugitive emissions are a relatively minor contribution to total GHG emissions; nevertheless, they can be proactively managed to achieve reductions. In late 2020, Eni Ghana undertook a survey of the ORF to identify gas leaks using an OGI (Optical Gas Imaging) thermal imaging camera. A total of 5,738 potential emissions sources were surveyed (86% of the total²⁷) and no leaks detected. Based on evidence of no leaks, fugitive emissions were recalculated to be 7.8 tonnes of CH₄ (methane) compared with a conservative pre-survey estimate of 81.4 tonnes/year.

A second sampling campaign is planned for Q3, 2021 to look at the remaining potential emissions sources before extending to survey to include the FPSO. This evidence-based calculation of the amount of CH₄ emissions is then likely to decrease even further unless leaks are detected.

Other initiatives recently implemented by Eni Ghana include:

- Use of bicycles at the ORF;

²⁷ The survey was limited to 86% of potential sources because areas of the plant where not operational at the time of the survey.

Offshore Cape Three Points

- Installation of photo-voltaic panels at the Bradley Tower, to power the building, to be completed by end of 2021;
- Elimination of diesel fuel for power generation at the ORF Pilot camp (November 2019), substituted with gas; and
- Replacement of light bulbs with energy efficient bulbs on the FPSO (ongoing).

Offshore Cape Three Points

Table 8-1: Summary of Findings, PS3

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
011_05/21	Ambient air quality - monitoring	In 2020 the monitoring programme was revised to exclude sampling at the helipad and pipeline areas. Any changes to the sampling programme should be agreed with the WBG; at the time of the VSV, WBG representatives did not recall such an agreement.	PS3	The IESC recommends that prior agreement with the WBG to amend the monitoring programme should be confirmed. In the event such agreement was not reached prior to the changes, Eni Ghana should retrospectively agree this change with the WBG.	Minor (Q3, 2021)
012_05/21	Stack emissions monitoring	A CEMS will be commissioned in late 2021.	PS3	A robust calibration is performed to ensure data generated by the CEMS is accurate and reliable in the absence of the originally envisaged stack emissions sampling. The CEMS should be calibrated to allow recording and reporting daily averages, under temperature and oxygen conditions required in WBG EHS guidelines.	Minor (Q4, 2021)
013_05/21	Noise monitoring	The industrial noise standard has been selected for the PAC. The IESC questions the appropriateness of the industrial/commercial standard when the PAC is intended to provide restful residential accommodation.	PS3	The appropriate noise standard for the PAC should be agreed with the WBG. The IESC further recommends a review of the sampling locations to ensure appropriate outdoor locations have been selected. In the event application of the residential noise standard is confirmed by the WBG it is recommended noise levels are measured at the façade of residential buildings. Such areas are unlikely to be affected by freezer fans and air conditioning units. Noise levels inside accommodation should also be measured to confirm restful conditions.	Minor (Q3, 2021)

Offshore Cape Three Points

9. PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY

9.1 Introduction

In this section the IESC's analysis focuses on Security. Community Health and Safety will be a focus for the next IESC site visit. Topics presented in this section are:

- SMP and Appendix Q of the contractor template;
- Security provision at the ORF and FPSO;
- Fishery-based incursions into the FPSO exclusion zone;
- Security management and MoU/Agreements; and
- Electricity connections to LRP options.

9.1.1 SMP and Appendix Q

In its 2019 AMR and Q1/Q2 2020 QMR monitoring report, the IESC stated that, "...the IESC understands the Production Phase SMP was finalised and then approval by the WBG in mid-November...". During a meeting with the Security Manager, the IESC was informed that the version of the SMP, current in late 2020, was in the final stages of the review/commenting process with only a very few minor text changes to be made. The Security Manager confirmed that the current SMP version is being implemented by the Project. Once the SMP is agreed/accepted by WBG and approved /signed off by Eni Ghana, it will replace the current version though 'on the ground' there will be continuity in security provision as the changes being made are minor.

Security-related requirements are provided to potential contractors via Appendix Q of the contract template. Appendix Q plays the same role as Appendix Y (SLC requirements) in the context of contractor management. The IESC expects that Eni Ghana will amend Appendix Q (by at minimum referencing the approved SMP). The status of Appendix Q will be checked by the IESC in the next site visit.

9.1.2 Security provision at the ORF and FPSO

Security at all onshore Eni Ghana Project-related sites is provided by a single provider, G4S. The security guards are unarmed. In 2020, following a national risk assessment undertaken by the Ministry of Defence, prompted by threats arising from a secessionist group based in the Volta Region, the ORF was deemed to be national asset 'at risk'. Around this time the general election was occurring, and this increased the risk profile of the ORF. Subsequently, and with the support of the government, a permanent armed police presence was established at the ORF with 2 police personnel being present per 12-hour shift: making 4 police personnel focusing only on ORF protection. There is a detachment of the military police based in the vicinity of the ORF and there is an informal arrangement between Eni Ghana and this detachment that enables the detachment to be called upon to assist security provision, as necessary.

With respect to the police presence, the Security Manager confirmed the following:

- G4S (as is the case with all security providers) has a standing arrangement with the police. This arrangement was instrumental in a smooth introduction of the police to the ORF site and managing the ORF security risks;
- The Ghana Police have signed-up to the Voluntary Principles on Security and Human Rights (VPs). There is a training session on the VPs every quarter;

Offshore Cape Three Points

- Weapons training is part of ongoing training and rules of engagement are specified and applied; and
- The ORF Security Officer is present at all training events.

In Q3 2020, a grievance was raised against a G4S guard which was later closed-out (see section 6.9.1 for brief details). This is the first grievance, noted by the IESC, involving a security guard.

Regarding the FPSO, the main security issue is the prevalence of incursions into the exclusion zone by the canoes of offshore fishermen. The ‘on the ground’ security response to this risk has not changed over the past few years. Essentially, security provision consists of daily patrols by the ‘Pacific Python’ chase vessel. There are two Fishery Liaison Officers (FLOs) on board who are authorised to interact with fishers to attempt to prevent incursions and/or encourage fishers to leave the exclusion zone. Eni Ghana, in concert with other IOCs still maintains a long-term goal of having the Ghana Navy being deployed to patrol all offshore O&G facilities. In the interim, Eni Ghana has been in discussion with the Ministry of Defence/Navy reach an agreement (MoU) that Navy personnel will be deployed on board the ‘Pacific Python’ or a similar vessel. The effectiveness of this approach depends on the powers that might be delegated to the personnel. At minimum, the presence of uniformed Navy personnel, supporting the FLOs and engaging directly with fishermen, is considered likely to enhance the deterrence effect of the ‘Pacific Python’ and its FLOs.

An MoU with the Ministry of Defence/Navy has been under discussion for at least two years, but agreement has not yet been reached. See Section 9.1.4 and previous IESC reports for further details.

9.1.3 Fishery-based incursions into the FPSO exclusion zone

Eni Ghana has continued collecting and presenting monitoring data on the number of fishing vessel incursions into the 500-metre exclusion zone around the FPSO. In 2020, the cumulative total of incursions was 5,160 which was considerably higher than the equivalent figure for 2019 (3,744). Eni Ghana considers that the 2019 figure is lower due to its engagement campaign with coastal communities to discourage incursions and the Governments’ moratorium on certain types of offshore fishing for a limited period in that year.

It is not possible to be sure of the total number of incursions that will occur in 2021 due to lack of data. It is possible; however, to compare the Q1 2021 cumulative total with Q1 2020. Figure 9-1 shows that the Q1 2021 cumulative total is 1,379 which compares with the Q1 2020 cumulative total of 1,088.

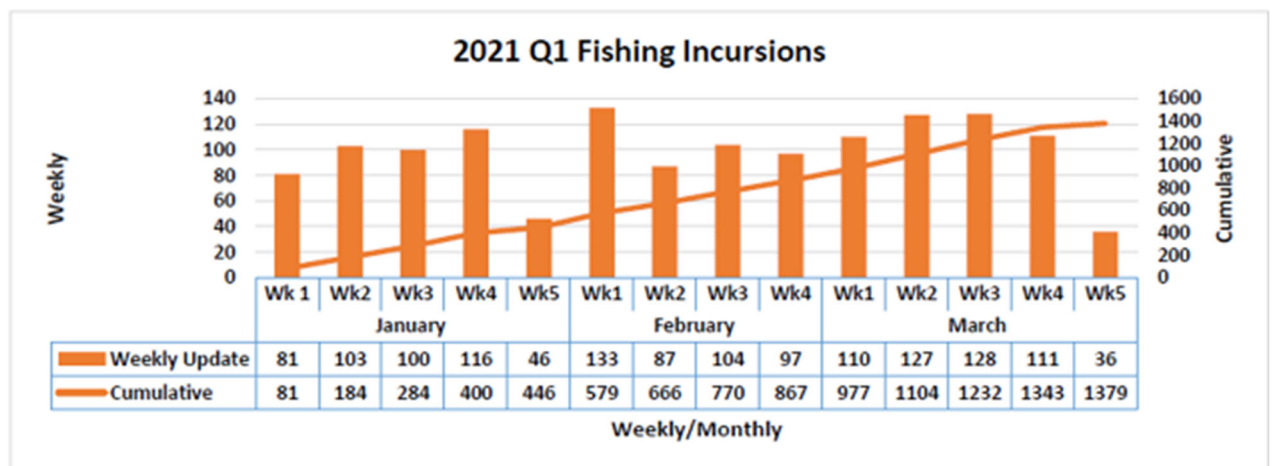


Figure 9-1: Q1 2021 – Weekly, monthly and cumulative totals of incursions

Offshore Cape Three Points

Given this Q1 increase of 30% in the number of incursions compared to Q1 2020 and the established pattern of the number of incursions increasing in Q2 and Q3 in previous years; the current 2021 data indicates that, in 2021, it is unlikely that there will be a reduction in the number of incursions compared to 2020 (assuming currently unknown factors/events do not intervene).

Previously, Eni Ghana implemented two separate, but linked actions to try to reduce the level of incursions:

- Making a visual/written record of vessel identifiers (such as canoe name) and then determining the identity of the canoe owner from the licensing authority's database²⁸; and
- Engaging with fishers in those coastal communities thought to be the base for most of the canoes which breach the FPSO exclusion zone. When necessary, in such meetings individual canoe owners were informed that Eni Ghana was aware that they breached the exclusion zone.

During 2020, these actions ceased for various reasons such as COVID-19 restrictions on travel/meetings and a reluctance of certain FPSO staff to be responsible continually for making records of canoe identifiers. Eni Ghana is considering initiating another engagement campaign with coastal communities later in 2021. The IESC supports initiation of this engagement campaign and recommends that making a visual/written record of vessel identifiers and, subsequently, identifying vessel origin and owners should resume. If FPSO staff are reluctant to undertake the task of noting vessel identifiers, then the FLOs on the '*Pacific Python*' should be given this task and, as necessary, two additional FLOs should be recruited to be based upon the FPSO and perform the same duties as the '*Pacific Python*' FLOs.

9.1.4 Security Management and MoUs/Agreements

Despite Eni Ghana's best efforts, little has changed since previous IESC monitoring reports were issued. For offshore security there are still two options being pursued:

- Eni Ghana-focused approach based on trying to reach bilateral agreement/s with the Ministry of Defence/Ghana Navy (for example, presence of Navy personnel on the '*Pacific Python*'); and
- A collective approach based on a multilateral agreement (all IOCs) and Ministry of Defence/Ghana Navy whereby the Ministry of Defence/Navy provides security for all IOC offshore assets. Eni Ghana is constrained, to a certain extent, in terms of the initiatives it can pursue itself by its commitment to this collective approach.

Within the context of these two approaches, correspondence is exchanged, and meetings held but progress continues to be very slow (of note, a proposal by the Ministry of Defence that IOCs hire vessels, with deployed naval personnel, from a private company has not found favour with the IOCs). The IESC repeats a previous recommendation that Eni Ghana continues to implement its best endeavours to reach appropriate bilateral and/or multilateral agreements that will reduce, significantly, the scale of fishing canoe incursions.

In terms of onshore security, the key issue is the ORF and the gas export sealine. As indicated in Section 9.1.2, an informal arrangement exists with respect to the detachment of military police based in the vicinity. Efforts to have this arrangement formalized have not yet succeeded. It is recommended that Eni Ghana continues to implement its best endeavours to reach a formal agreement.

²⁸ According to Eni Ghana data, this approach allowed between 10% and 20% of canoes to be allocated to an owner/community.

Offshore Cape Three Points

The recent deployment of a permanent police presence at the ORF has raised a similar issue which is complicated by the pre-existing agreement between G4S and the police. The details of the arrangement appear not to be known by Eni Ghana. Though 'on the ground' activities in terms of application of the VPs and firearm and other trainings are aligned with good practice, the apparent lack of knowledge and oversight about the G4S/police agreement is of concern and poses a risk of non-compliance with the Project standards for security management. It is recommended that Eni Ghana takes steps to ensure that is fully aware of the agreement and considers its implications in terms of Eni Ghana's ability to abide by the standards that apply to the Project. As necessary, action will be taken through a local variation to the agreement to ensure that the agreement is aligned with Eni Ghana's expectations.

With respect to all MoUs/Agreements between Eni Ghana and government security forces such as the Navy and the police, these MoUs/Agreements must be compliant with PS4 requirements regarding deployment of government security personnel.

9.1.5 Electricity connections to LRP options

During the VSV, the IESC was provided with photographic evidence of recently-installed electricity connections to certain LRP 'options' structures.

Figure 9-2 and Figure 9-3 show two such connections, which the IESC believes to be similar to connections to other structures related to the options. The connections are installed on external walls with minimal protective enclosures and exposed wires that are within easy reach of children. Thus, the IESC considers that these installations pose a community health and safety risk. It is recommended that Eni Ghana undertakes a community-focused health and safety risk assessment of all the electrical connections to 'options' structures and implements measures that will reduce the risk to an acceptable level, where necessary.



Figure 9-2: Electricity connection to an 'option' structure



Figure 9-3: Close-up of connection

Offshore Cape Three Points

Table 9-1: Summary of Findings, PS4

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
014_05/21	Fishing canoe incursions into the FPSO exclusion zone	The incursion of fishing vessels continues to present a significant security risk. The cumulative number of incursions in 2021 is likely to exceed the 2020 cumulative total of ~5,200.	PS4	Eni Ghana to: <ul style="list-style-type: none"> Resume noting vessel identifiers and, subsequently, recording data on the origin and ownership of vessels. If FPSO staff are reluctant to note vessel identifiers, then the FLOs on the 'Pacific Python' should be given this task and, as necessary, two additional FLOs should be recruited to be based upon the FPSO and perform the same duties as the 'Pacific Python' FLOs; and Continue to implement its best endeavours to reach appropriate bilateral and/or multilateral MoUs/agreements (compliant with PS4 requirements regarding deployment of government security personnel) that will reduce, significantly, the scale of fishing canoe incursions. 	High (Q3, 2021 and continuing)
015_05/21	Onshore security management at ORF	An informal arrangement exists between Eni Ghana with respect to the detachment of military police based in the vicinity of the ORF.	PS4	Eni Ghana continues to implement its best endeavours to reach a formal agreement with the military police.	Moderate (continuing)
016_05/21	Onshore security management at ORF	There is now a permanent police presence at the ORF and there is a pre-existing agreement between G4S and the police. The details of the agreement appear not to be known by Eni Ghana which poses a risk of non-compliance with the Project standards for security management.	PS4	Eni Ghana to take steps to ensure that is fully aware of the agreement and considers its implications in terms of Eni Ghana's ability to abide by the security standards that apply to the Project. As necessary, action will be taken through a local variation to the agreement to ensure that the agreement is aligned with Eni Ghana's expectations.	Moderate (Q3, 2021)

Offshore Cape Three Points

017_- 5/21	Community health and safety	The electricity connections installed on external walls of 'options' structures appear to have minimal protective enclosures and exposed wires that are within easy reach of children. Thus, installations pose a community health and safety risk.	PS4	Eni Ghana undertakes a community-focused health and safety risk assessment of all the electrical connections to 'options' structures and implements measures that will reduce the risk to an acceptable level, where necessary.	Moderate (Q3, 2021)
---------------	--------------------------------	---	-----	---	-------------------------------

10. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

10.1 Introduction

The Project is currently occupying land and offshore marine areas and will continue to do so. Both a Livelihood Restoration Plan (LRP), issued for disclosure in January 2016, focusing on land-based livelihoods and a Production-phase Fisheries Management Plan (2018) were prepared. Thus, the Project is managing land and fisheries-related economic displacement in separate, but linked procedures/activities. This section presents findings for the land-focused economic displacement only; beginning with the Livelihoods Restoration (LR) Programme, which is the non-monetary compensation element of the LRP. During the VSV, the IESC discussed fisheries issues, but none focused on livelihood issues; instead, attention focused on the fisheries grievances and their close-out and fishing canoe incursions into the FPSO exclusion zone. These fishery-related issues are considered in Sections 6.9.1 and 9.1.3 of this report.

10.2 Land - focused economic displacement

10.2.1 LR Programme Support Services

Originally, the 'Support Services' component of LRP implementation had a duration of three years (February 2018 to January 2021) with the work being undertaken by TNS. The main component of the 'Support Services' component is the selection, by eligible Project-Affected Persons (PAPs) of up to two income-generating options and the provision of facilities and starter packs of materials to enable the PAPs to generate revenue from their options. In its 2019 AMR and Q1/Q2 2020 QMR monitoring report, the IESC noted that,

"... there are significant challenges facing Eni Ghana's efforts to restore livelihoods, prior to the ending of the LRP Support Services component of LRP implementation at end January 2021. Given the uncertainty created by COVID-19 and the reliance on third parties such as the electricity provider, it is recommended that Eni Ghana reinforce its efforts to assist those PAPs not generating any revenues and, also, consider preparing an LRP Exit Strategy (focusing, for example, on the continuation of current actions and/or new actions), for ensuring livelihood restoration for PAPs if future monitoring and evaluation results show that the objective of livelihood restoration cannot be achieved by end January 2021."

Subsequently, Eni Ghana has extended the LRP end date to end July 2021 (preceded by a submission of a Management of Change notification, dated 24 December 2020, to WBG, VUGL and GNPC) and prepared a 'Livelihood Restoration Plan (LRP) Completion Strategy' which is guiding its work until end July 2021.²⁹ TNS is supporting Eni Ghana as it has retained, under an agreement with Eni Ghana, an 'on the ground' presence in Sanzule with two staff members continuing to work on LR Support Services delivery.

In the Q1 2021 QMR, it is stated that the 'Completion Strategy' is partly based on, *"...considering the status of PAPs restored livelihood in December 2020"*. By December 2020, it was clear to Eni Ghana that the challenges, alluded to in the quote above from the IESC's 2019 AMR and Q1/Q2 2020 QMR monitoring report, had resulted in a significant risk that livelihoods would not be restored by the planned end date of January 2021. The key aim of the 'Completion Strategy' is,

"To ensure that vulnerable PAPs (PAPs who have recorded revenues below the baseline across all impact levels) are provided with adequate capacity to generate revenues."

²⁹ The IESC has seen a draft of this Report (dated March 2021) and understands that a revised draft is under review by WBG. The IESC has been informed by WBG that the revised draft is not substantially different from the March 2021 version.

Offshore Cape Three Points

The 'Completion Strategy' identified that there were 132 PAPs (out of a total of 205) in need of the provision of extra in-kind support to ensure livelihood restoration by end July 2021. These are the PAPs targeted under the 'Completion Strategy'. Key actions under the 'Completion Strategy'; are:

- Extra in-kind support for targeted PAPs;
- Continuous monitoring, coaching and follow up;
- Completion of the connection to the national electricity grid for certain options (amounting to 25 PAPs); and
- Smooth transition between LRP and LDPj-CIS for the 205 affected Households.

Eni Ghana decided that 25 PAPs (12% of all PAPs) considered to have mismanaged their options would not be supported.

By the end of April 2021, the following actions were underway or completed:

- All outstanding electricity connections (25) to income-generating facilities/activities were in place. Almost immediately, this meant that those PAPs unable to generate incomes, due to lack of power, could begin to generate incomes;
- The establishment of all 344 individual options was completed (only some PAPs were entitled to a second option; thus, the total number of options is less than the number expected if all PAPs had been eligible for two options (205 x 2 = 410 options);
- Procurement process underway to assist with providing the necessary extra support services; and
- A meeting of the Livelihoods Steering Committee.

Eni Ghana is planning for the external completion implementation audit³⁰ to occur by end December 2021 (within six months after completion of LRP implementation). This date is six months before the date for this audit, as set by the ESAP, which is one year after completion of LRP implementation. As deviation from the ESAP requires WBG agreement, the timing of this audit is under discussion with the WBG. By attempting to bring this audit forward; Eni Ghana is setting a challenging deadline as there is a risk that an 'early' audit will not be able to capture, adequately, sufficient credible data showing sustained livelihood restoration.

Irrespective of the date of this audit, if it produces recommendations for further work then the required actions will be implemented with the support of TNS. The IESC notes that the purchase requisitions were only submitted recently. Assuming procurement can be finalized by the end of May, this leaves only two months for the required services to be implemented and the expected results, in terms of livelihood restoration, to occur. It is recommended that Eni Ghana gives priority to completion of the procurement process so that the services can be delivered as quickly as possible.

10.2.2 Monitoring and evaluation

Introduction and context

Monitoring and evaluation is required to demonstrate PAP livelihood restoration status post-LRP implementation. In the LRP, livelihood restoration is defined as follows:

³⁰ This is the term used in the ESAP item 10g, ".....Completion Implementation audit carried out by an external competent resettlement professional and report submitted to WBG" and "Completion audit: One year after the completion of the implementation of the LRP."

Offshore Cape Three Points

“The provision to economically displaced persons whose livelihoods or income levels are adversely affected of opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living.”

The only means of confirming that the restoration of livelihoods has occurred is through a monitoring and evaluation process that provides credible data on the pre- and post-LRP livelihood status of PAPs. The LRP also states the following,

“The effects of the LRP will be tracked against the baseline conditions of the affected households prior to displacement Impact monitoring will monitor changes in household livelihood patterns, wellbeing, asset ownership, access to health and education, food security and gender equality based on self-reported information by each of the individual land affected households.”

The LRP does not present the indicators to be monitored against for these selected household characteristics. Thus, selection of indicators is a decision yet to be made by Eni Ghana.

Livelihood restoration status – results to date

In 2019 and 2020, Eni Ghana issued two reports providing data on revenue generation, that is, revenue obtained from the options, against baseline incomes (as of 2015)³¹. The latter (and last) of these reports, issued in February 2020, uses data from November 2019³². Out of 200 PAPs (5 PAPs could not be included in the analysis), it was found that 28% of the PAPs (55) were generating more revenue than their baseline income. However, 72% of the PAPs (145) were either not generating revenue or generating revenue less than their baseline income.

Eni Ghana has provided a spreadsheet (February 2021) presenting more recent results for all PAPs and, also, by PAP impact category (presented in Figure 10-1 and Figure 10-2). Figure 10-1 shows that that the situation has reversed, which is probably due to a combination of factors:

- Completion of options and electricity connections allowing many PAPs to begin generating revenues;
- Continuing and focused support, to those PAPs not generating sufficient revenues, from TNS and Eni Ghana; and
- Reduction in COVID-19 restrictions.

Overall, almost one-third of PAPs (60) are generating revenues below the baseline and need continuing and, in some cases, additional support.

³¹ Although the LRP is dated 2016 (January) the baseline data on incomes are from 2015.

³² Eni Ghana (2020) Report of Monitoring and Evaluation of Livelihood Restoration Plan (LRP) Implementation (Options 1 & 2).

Offshore Cape Three Points

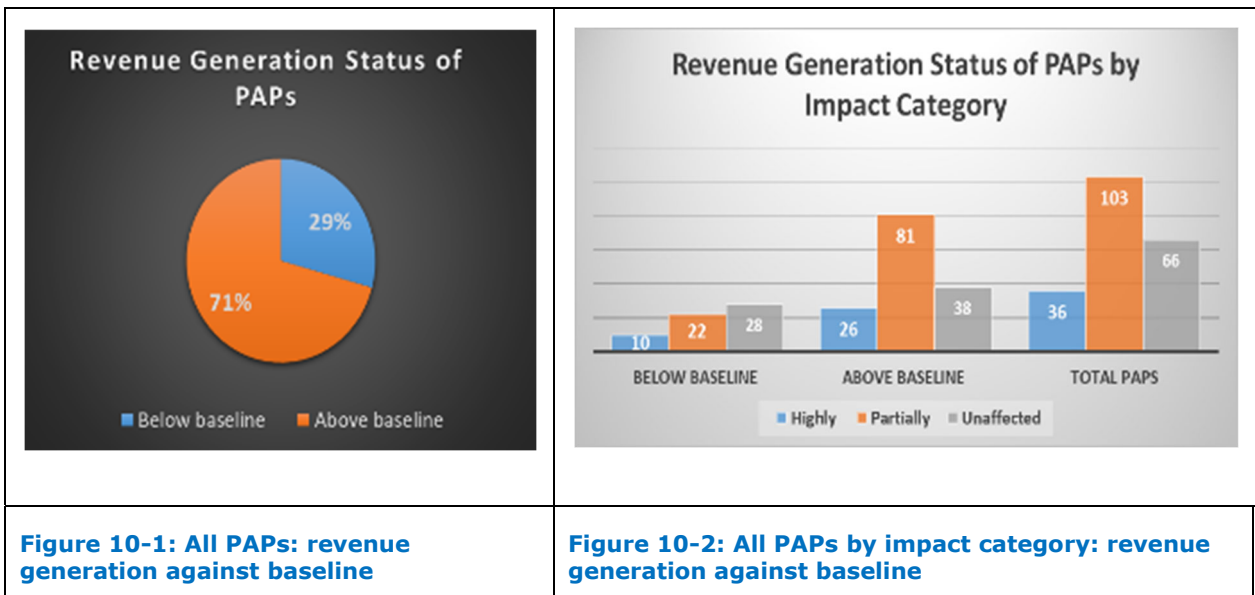


Figure 10-1: All PAPs: revenue generation against baseline

Figure 10-2: All PAPs by impact category: revenue generation against baseline

Figure 10-2 provides information on revenue generation status by the three categories of PAPs as defined in the LRP. The information enables the relative performance of each category to be determined in terms of generating revenue below baseline:

- Highly-impacted PAPs³³ (28%);
- Partially-impacted PAPs³⁴ (21%); and
- Unaffected PAPs³⁵ (42%).

Proportionally more highly-impacted PAPs are generating revenues below baseline compared to partially-impacted PAPs, but the difference is less than might be expected. However, the relatively high number of unaffected PAPs generating revenue below baseline is surprising (of note, these PAPs were restricted to one income-generating option; whereas PAPs in the other two categories could choose two options).

Livelihood restoration status – Eni Ghana approach and methodology

Determining when livelihood restoration has been achieved is an important challenge in resettlement. As stated in a recent guide to resettlement planning/implementation entitled ‘Resettlement Guidance and Good Practice’ (European Bank for Reconstruction and Development, undated) it is stated that,

“There are no universally accepted measures for determining this [livelihood restoration] and therefore these measures have to be developed on a case-by-case basis, based on the information collected during the census and socioeconomic survey.”

This means that the work done/information collected during preparation of and implementation of an LRP will determine the measures to be applied.

To determine that livelihoods are restored, Eni Ghana is using revenues (which seem to be considered as incomes) as the metric for monitoring livelihood restoration progress and status. There are some weaknesses on focusing only on incomes. Measuring incomes at one point of time pre- and post LRP implementation and finding the income post-LRP is equal to/greater than pre-LRP level is not a very accurate predictor to the sustainability of livelihood restoration. Some

³³ These PAPs can be considered as the most vulnerable category due to losing the more than 50% of livelihood because of land take.

³⁴ These PAPs gain most of their income from non-agricultural activities and have only limited dependence on land taken by the project.

³⁵ These PAPs may have some land affected by land take, but they do not use it.

Offshore Cape Three Points

PAPs may not invest income in a manner that can ensure the desired sustainability. Also, this direct comparison of incomes ignores the effect of inflation. The purchasing power of a specific income in one year will be less in a subsequent year if inflation occurs and the income remains the same or increases but at a rate lower than the inflation rate³⁶. The IESC recommends that comparisons of incomes pre- and post- LRP must take account of inflation before reaching a conclusion that livelihoods have been restored/improved.

In addition, Eni Ghana and TNS reports that compare revenues, from the options, to baseline incomes are not clear in terms of explaining that the comparison is justifiable; that is revenues and incomes can be treated as being comparable and that any comparisons are meaningful. The IESC recommends that future Eni Ghana and TNS reports contain text that provides a justification for this approach adopted by Eni Ghana and TNS.

The first quote above, from the LRP, presents three components of livelihood restoration: income-earning capacity, production levels, and standards of living. Monitoring incomes provides data relevant to only one of these three components: income-earning capacity. The second quote, from the LRP, suggests some additional metrics for monitoring, including: asset ownership, access to health and education, and food security. TNS has prepared a draft 'Endline' report (February 2021)³⁷ in which it monitors several metrics using 2018 PAP data as the baseline year. In addition to income, the TNS work measures dietary diversity and access to credit; giving a broader picture of livelihood restoration than use of incomes alone. The draft 'Endline' report finds that average incomes overall are slightly higher than baseline and average dietary diversity has improved, but not significantly.

The IESC observes that the draft Eni Ghana 'Completion Strategy' report (March 2021) makes almost no reference to the findings of the TNS report (February 2021). It is noted, however, that TNS is expected to produce a '*Project Impact Assessment and Evaluation Report*' by April 2021³⁸ and it is indicated that this report's findings will contribute to the 'Completion Strategy' and livelihood restoration decisions made based upon the outcome of implementing the 'Completion Strategy'. The IESC recommends that Eni Ghana broadens the scope of the metrics used to determine livelihood restoration status; ideally adding metrics that provide an indication that livelihood restoration, including aspects such as 'standard of living', is likely to be sustainable over time.

As noted above, TNS has used averages of metric values for assessing changes over time. Averages over large groups with differing characteristics have limitations, in this context, as they can conceal significant differences in performance by differing groups of PAPs. Such averages, require provision of complementary information on specific groups such as those listed above, that is: highly-impacted; partially-impacted and un-affected PAPs; groups exhibiting differing types of vulnerability; and groups implementing specific mixes of options, to add more fine-grained meaning and, therefore, understanding of changes in livelihood status. Without such complementary information, it is very difficult to determine if specific PAPs or groups of PAPs need assistance without analysing the raw data on individual PAPs. Given that TNS's work will feed into Eni Ghana's decision-making on livelihood restoration status once the 'Completion Strategy' is concluded, the IESC recommends that average values, over all PAPs or groups of PAPs, are only used when complemented by provision of more fine-grained information on the types of groups mentioned above.

In both Eni Ghana and TNS reporting on monitoring and evaluation, the IESC notes a lack of consistency and clarity on the identification of vulnerable PAPs. In some instances, the vulnerable

³⁶ Since the 'LRP' year of 2016, the inflation rate in Ghana has not fallen below 7% year-on-year.

³⁷ The IESC understands that this report had been revised and is undergoing WBG review.

³⁸ This TNS report was not available to the IESC at the time of drafting this May 2021 monitoring report.

Offshore Cape Three Points

PAPs are the 'Highly-impacted PAPs'. The TNS draft 'Endline' report contains the following sentence,

"Of these highly impacted households a proportion is classified additionally as highly vulnerable because they have certain existing characteristics, which make these households less resilient to change."

In the 'Completion Strategy', vulnerable PAPs are those PAPs who have recorded revenues below the baseline across all impact levels ('highly-impacted' etc). Further it is stated that,

".....attention will be focused truly vulnerable PAPs like the aged and women/single women led households." Later, it is stated that, "...the provision of extra in-kind support will be directed to ninety-eight (98) vulnerable LRP beneficiaries with low revenues.

It is noted that the LRP mentions both 'highly vulnerable' and 'vulnerable' PAPs and provides a list of 'highly-impacted' and 'highly vulnerable' households. The draft 'Endline' report does not provide any data or analysis of livelihood restoration for any 'vulnerable' group of PAPs apart from the 'highly-impacted' (who are considered all to be 'highly vulnerable' in contradiction to an earlier statement in the report that only a proportion of the 'highly-impacted' PAPs are 'highly vulnerable').

At the time of the VSV, Eni Ghana and TNS reporting on livelihood restoration does not clearly and unambiguously provide a breakdown of livelihood restoration status between vulnerable and non-vulnerable PAPs. Such a breakdown is an element of good international industry practice in resettlement planning in terms of meeting PS5 requirements. The IESC recommends that Eni Ghana ensures that vulnerable PAPs are identified, clearly, with reference to the LRP and any change made to the LRP's 'list' of vulnerable PAPs is explained. Further, livelihood restoration status for the vulnerable PAPs (whether the original LRP 'list' or a final Eni Ghana 'list') is presented, consistently, in all future reporting on livelihood restoration status.

10.2.3 External Interim Audit

As required by the ESAP item 10f), Eni Ghana commissioned an interim implementation audit of the LRP which was undertaken by an external consultant between 23 April and 3 May 2019. This interim implementation audit will be followed by the external completion implementation audit (see section 10.2.1 above, as per the ESAP requirement 10g), which Eni Ghana plans will be undertaken by end December 2021. As stated earlier, this date is not yet agreed with WBG.

Offshore Cape Three Points

Table 10-1: Summary of Findings, PS5

ID	Aspect	Issue Description	Standard	IESC Recommendation	Significance (indicative date for completion)
018_05/21	Livelihood restoration: LR Programme 'Support Services'	LRP completion is expected at end July 2021. Purchase requisitions, to enable certain necessary services to be implemented, were only submitted recently. Assuming procurement can be finalized by the end of May; then this leaves only two months for implementation of the required services and the expected results, in terms of livelihood restoration, to occur.	PS5	Eni Ghana to give priority to completion of the procurement process so that the services can be delivered as quickly as possible.	Moderate (N/A)
019_05/21	Livelihood restoration: Monitoring and evaluation	Eni Ghana is using a comparison of pre- and post-LRP incomes as a metric for deciding on livelihood restoration status. There are three weaknesses in this approach: <ul style="list-style-type: none"> Focus on incomes alone to determine livelihood restoration status is not aligned with the LRP approach to determining livelihood restoration status; The comparisons exclude reduction of purchasing power due to inflation; Revenues are compared to incomes, but reports do not justify the validity of this comparison clearly; and 'Average' incomes are used. Averages have limitations as they can conceal significant differences in performance by differing groups of PAPs; unless they are accompanied by complementary information for different groups. 	PS5	Eni Ghana to implement the following actions: <ul style="list-style-type: none"> Expanding the metrics used to monitor and evaluate the status of livelihood restoration; ideally adding metrics that provide an indication that livelihood restoration, including aspects such as 'standard of living', is likely to be sustainable over time; Ensuring that comparisons of incomes pre- and post-LRP must take account of inflation before reaching a conclusion that livelihoods have been restored/improved; Future Eni Ghana and TNS reports to contain text that provides a justification for the approach of comparing revenues to incomes; and Average values, should only be used when complemented by provision of 	High (all continuing)

Offshore Cape Three Points

				more fine-grained information on specific groups.	
020_05/21	Livelihood restoration: Monitoring and evaluation	Current Eni Ghana and TNS reporting on livelihood restoration status does not clearly and unambiguously provide a breakdown of livelihood restoration status between vulnerable and non-vulnerable PAPs.	PS5	Eni Ghana to ensure that vulnerable PAPs are identified clearly and livelihood restoration status for the vulnerable PAPs is presented, consistently, in all future reporting on livelihood restoration status.	High (continuing)

11. PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

11.1 Introduction

The IESC chaired a number of meetings relating to the management of biodiversity aspects in the reporting period and involving the following parties: ESL Consulting, FFI, Eni HQ and WBG (as observer). In addition, video footage and photographs of the site were viewed during the virtual site walkover session, focussing on the ORF, the turtle hatcheries on the beach, plant nursery, reinstatement areas and areas previously noted to be subject to erosion and drainage issues during the previous site walkovers to gauge progress.

This chapter presents the findings of the IESC monitoring in relation to biodiversity elements, including revisiting findings of the previous site visit and desk-based audit, with updates provided as appropriate. The chapter focuses on:

- Production Phase Sea Turtle Biodiversity Action Plan (BAP);
- Production Phase Avian BAP;
- No Net Loss Strategy for Natural Habitat;
- Vegetation reinstatement and recovery;
- Site drainage and erosion control; and
- Marine monitoring.

The status of previously identified issues is also reviewed in Appendix 4 and summarised below:

- 1) AMR and QMR reports now discuss survey effort for sea turtles and avifauna separately to avoid any confusion relating to which group was the subject of survey in any given period and to facilitate the verification that surveys are taking place in accordance with the expected monitoring schedule for each species group.
- 2) Documentation and reporting of biodiversity-related training is now taking place.
- 3) Offshore monitoring activity during the Production phase has now been clarified and will comprise incidental sightings of marine mammals and sea turtles with dedicated watches as required prior to noisy operations such as drilling. In relation to fish and plankton monitoring, there is no clear driver to recommence this activity at present.
- 4) Eni Ghana, under advice from ESL, has chosen to regenerate swamp (by lowering the ground level) rather than use soft engineering options to reduce erosion and subsequent sedimentation of the swamp habitat. This activity is proving successful to date and monitoring remains ongoing.
- 5) Additional Conservation Actions have now been selected and are presented in the Biodiversity Action Plans.
- 6) The No Net Loss Strategy is now in place and a full Implementation Plan is in preparation.
- 7) Beach patrols during peak turtle nesting season now form part of ESL's beach monitoring survey activity rather than being the responsibility of security personnel. Although no enforcement action is possible this does act as a deterrent to poaching.
- 8) A community conservation programme is now the responsibility of ESL, with the successful commencement of an awareness campaign and clear annual BAP targets set. This includes a long-term programme of community-engagement focusing on vulture conservation.

Offshore Cape Three Points**11.2 Production Phase Sea Turtle BAP**

The Production Phase Sea Turtle BAP has been updated by FFI and the Eni HQ biodiversity team and approved by WBG in November 2020. BAP actions were implemented throughout the reporting period, and details on specific aspects are provided below.

The IESC recommends that in future it would be preferable to embed the relevant monitoring results and supporting documentation into the relevant QMR (likely Q1 and Q4) and AMR reports, including the End of Season summaries and trends.

11.2.1 Monitoring

Sea Turtle surveys were conducted by Ghana Wildlife Society (GWS) in January and February 2020. ESL Consulting (ESL) then took over the responsibility for these surveys and other aspects of the sea turtle BAP, from June 2020 onwards, with monitoring following the survey schedule set out in the BAP (every day in the peak season of October to December and 3 days per week in the shoulder seasons (August / September and January / February), with an annual beach habitat assessment in November). 140 survey days were completed in total, which equals the survey effort for the 2019/2020 period. These monitoring patrols also provide visible security to mitigate the risk of poaching.

As outlined in the QMR and AMR reporting, the Cyber Taker App for sea turtle monitoring has now come into full time use. This enables monitoring results to be viewed in real time and helps to quantify beach disturbance activities that may be preventing nesting attempts. A draft end of season sea turtle monitoring summary report was provided for review, which outlines the results of onshore sea turtle monitoring activities from August 2020 to February 2021 and reports progress against the BAP targets. During the survey period, olive ridley was the only species observed nesting in the survey area. Nesting activity was low throughout the survey period, with single nests encountered in each month, with the exception of November (eight nests) and February (zero nests), though all nesting attempts observed were successful (eggs successfully deposited). All nesting activity was encountered outside the direct impact zone as defined in the BAP (landfall location plus 300 m each side), though it is considered that this is due to the disturbance levels associated with the villages at this location rather than being related to the landfall itself.

Nesting activity in the Project area was low compared to other studies conducted by the Ghana Turtle Research Project on other known nesting beaches in Ghana. In terms of absolute numbers, the current survey period recorded the highest number of nests in the Project area compared to all previous Project surveys, including the baseline survey period (2015-2016), which recorded the second highest absolute numbers. This is, however, at least partly attributed to the high number of survey days achieved (140) and when standardised against effort the results indicate lower nesting activity than the 2018/19 period, when the highest nesting rate was recorded.

Four nests were observed to hatch over the monitoring period, comprising three *in-situ* nests and one nest which had been relocated to the hatchery at Krisan following a poaching attempt which was interrupted by the beach patrol, see Section 11.2.2). Hatching and emergence success was comparable between the *in-situ* nests and the hatchery nest, which illustrates the success of the translocation of the eggs to the hatchery without adversely affecting their viability.

The habitat assessment revealed that the beach slope remains gentle and that the back beach had become wider due to accretion, which are both positive indicators. However, it was also observed that community lighting has increased in both number and intensity (and is one possible reason for the aforementioned observed lack of turtle nesting activity in the high impact zone). The number of lights was observed to have increased by 93% since 2016, with an increase in intensity of 40% since 2016. This significantly exceeds the BAP warning threshold of

Offshore Cape Three Points

>25% increase compared to baseline. The Eni Ghana environment team is responsible for coordinating management responses if thresholds are exceeded, and discussions with the community Anwolakrom and Bakanta (where lighting was observed to be most intense) were held on 25th March 2021 on how to mitigate this. It is understood that no satisfactory solution was reached, due to the community need to ensure the beach area by the communities is well lit to prevent public defecation and theft in this area and to facilitate fish-mongering activity. Given the uncertainty regarding cause and effect (e.g. sea turtles may be selecting the areas away from the communities to nest due to a preference to utilise areas where there are coconut plantations backing the beach, rather than avoiding lit areas), a decision was made to adopt the 'Do Nothing' scenario, but monitor for at least one more year, with increased attention on whether the lighting is influencing turtle behaviour and further engagement with the community should any negative effects of the lighting be confirmed.

Bycatch of turtles in fishing gear continues to present a threat to turtles at sea. During March 2021, one juvenile green turtle was accidentally captured in a fishing net, with the patrol team called in by the fishermen to release the individual, which appeared to have drowned when entangled in the net. In all, four dead turtles were recorded in the area over survey period: two olive ridley and two green turtles, including the aforementioned individual. The cause of death for the three other turtles was not known but was also believed to have been caused by fishery interaction. There were no signs such as injuries, broken shell etc that could suggest that the cause of death was associated with the Project.

11.2.2 Hatcheries

The three hatcheries remain in place in Eikwe, Krisan and Bakanta. The Krisan hatchery was used to receive a clutch of eggs for which a poaching attempt was intercepted in by the ESL beach patrol team. Translocation was successful and hatching/emergence success comparable to *in-situ* nests.

The hatcheries are currently in a state of partial disrepair due to the time they have now been in place; primarily involving missing signage and the collapse of plastic anti-predator fencing. It is understood that repair will take place immediately prior to the commencement of the next monitoring season in August 2021, so they are ready to receive any nests requiring translocation in the next key period of turtle nesting activity. Replacement anti-predator fencing will be constructed of metal for greater durability and will be partially buried underground to discourage access by digging predators, which include dogs and crabs.

Hatchery photographs were provided for review (examples in Figure 11-1).



Figure 11-1: Latest photographs of sea turtle hatcheries

Offshore Cape Three Points**11.2.3 Plastic Waste Recycling Initiative**

The plastic waste recycling initiative is ongoing, with 1237 kg of plastic collected so far by Enterprise and sent for recycling. The initiative was launched in February 2020 with the first collection for recycling undertaken in August 2020. In addition, following the success of the 2019 event, it is understood that a further beach clean is planned for Q3/4 2021.

11.2.4 Community Education and Awareness

ESL Consulting reported on the turtle related community awareness activities that they performed during the reporting period, following strict COVID-19 protocols. These activities were carried out over a four-day period in November with the objective of creating an attitude of stewardship and fostering recognition of and compliance with the conservation and management strategies within communities in the AoI. The awareness campaign took the form of documentaries, talks, and poster display at selected vantage points within the communities. In all, a total of 833 community members (including adults and children above 12 years) were engaged in the 2020/21 awareness campaign, which exceeds both the BAP target for this activity (50 people) and the total for the previous reporting period (95 people).

In combination with the survey patrol teams, which appear to be the most effective measure against poaching, the community awareness and education appears to be having positive results, with the lowest recorded incidence of poaching during the reporting period ((7% of nests observed were disturbed compared to the previous lowest recorded incidence of 11% in 2018/19, acknowledging that this is unlikely to be a statistically significant difference) and some fishermen observed to be releasing turtles from nets when accidentally caught. It is noted, however, that not all fishermen have the same attitude and during community consultation at Kisan, fishermen revealed that they were reluctant to release turtles caught in nets. As such, the IESC understands Eni Ghana is considering provision of incentives for fishermen to commit to releasing turtles, for example paying the repair costs to fix torn nets.

11.2.5 Staff Training

No new staff or contractors were employed during the review period, therefore no induction training relating to sea turtles took place, though it was reported during the virtual monitoring visit that refresher training in sea turtle ID and the prohibition of poaching took place. A transcript of sea turtle training given to FPSO staff in February 2021 was provided for review. The end of season sea turtle monitoring report states that twelve existing Eni Ghana staff were given this training, however this could not be verified as the attendance sheets provided for review covered seven staff in total and all appear to relate to a training session on 15th June 2016.

The end of season sea turtle report also states that during 2020, detailed additional training, including the nest translocation protocol, was provided by ESL's sea turtle expert, to ESL staff and local community members, since some of the patrol team members were new recruits. This is in line with the requirement that such training should take place every season, as outlined in the Sea Turtle BAP.

The IESC recommends that in future transcripts and attendance records are kept for each training session held, with a date clearly shown.

11.2.6 Bush Meat Action Plan

The Bush Meat Action Plan, which was developed to prohibit employees and contractors from capturing or trading sea turtle meat and/or products, continued to be implemented during the reporting period. To date, no Eni Ghana workers or contractors have been recorded in breach of the Bushmeat Action Plan.

Offshore Cape Three Points**11.3 Production Phase Avian BAP**

The Production Phase Avian BAP has been updated by Flora and Fauna International (FFI) and the Eni HQ biodiversity team and subsequently approved by WBG. The BAP aims to avoid where possible, and reduce impacts to birds and their habitats to as low as reasonably practicable and implement measures to achieve Net Gain for sanderling (*Calidris alba*) and royal tern (*Thalasseus maximus*) and No Net Loss for hooded vulture (*Necrosyrtes monachus*). Details of specific BAP actions implemented throughout the reporting period are provided below.

The IESC recommends that in future it would be preferable to embed the relevant monitoring results and supporting documentation into the relevant QMR (likely Q1 and Q4) and AMR reports, including the end of season summaries and trends.

11.3.1 Shorebird Monitoring

The 2020 AMR report indicates that shorebird monitoring was conducted by GWS in January and February 2020 and by ESL from June 2020 in accordance with a new Environmental Monitoring Contract. From that time, ESL conducted monthly surveys on shore bird species abundance and distributions along the coastline of the Project Area of Influence (AoI) and at the Amansuri estuary. Review of the monthly and end of season shorebird monitoring reports confirms that survey effort for shorebirds was conducted in accordance with the Avian BAP schedule, using a combination of point and transect surveys undertaken during low tide events.

Shorebird numbers over the period peaked in September 2020, which coincides with the expected seasonal peak observed in other years. Most species encountered over the survey period are classified as Least Concern and 4 are classified as Near Threatened on the IUCN Red List. The Near Threatened species bar-tailed godwit and Eurasian oystercatcher were recorded in higher numbers than reported during previous monitoring. Two additional Near Threatened species (African skimmer *Rynchops flavirostris* and curlew sandpiper *Calidris ferruginea*) were also recorded in low numbers. This is the first record of curlew sandpiper since 2017, when it was present in similar numbers, and African skimmer does not appear to have been recorded during previous monitoring.

Numbers of the two BAP priority species; sanderling and royal tern appear to remain low compared to the pre-construction survey results, though it is acknowledged that the baseline dataset was based on a single visit during November 2015 and may not have been representative. Royal tern is all but absent from the shoreline in the Project AoI, the baseline in this area only having recorded three individuals and only four having been sighted since that time (one pair on two occasions). It is, however, commonly sighted at the Amansuri Estuary site, which is outside the Project AoI. Overall numbers of these species recorded at the Amansuri estuary during the reporting period appear to compare favourably to those recorded in other years with the exception of the pre-construction survey. The disturbance survey conducted during the reporting period suggests, in line with previous observations, that fishing is the main cause of disturbance to shorebirds. The end of season shorebird report acknowledges that further surveys over the long term are required in order to confirm that Eni Ghana's operations are not affecting shorebirds in the Project AoI and if the variation in bird numbers is due to seasonality, localised migration between sites or disturbance mainly from anthropogenic sources³⁹.

The draft end of season monitoring report provided for shorebirds covers the period from June 2020 to February 2021; however the peak season against which BAP targets are measured extends from September to April, therefore the best time for the finalisation of this report would

³⁹ IESC understands Eni Ghana is planning further survey work via a collaboration between ESL and CAW as described in Section 11.3.5

Offshore Cape Three Points

appear to be in May, following the end of the peak season when all relevant data is available. The IESC therefore recommends that the timing of this reporting cycle is reviewed to ensure that it includes clear reporting against the BAP targets for shorebirds. The IESC notes that warning thresholds for sanderling density along the beach transect and baseline disturbance levels have yet to be developed due to insufficient data, but that this will be developed at the end of the 2020/21 monitoring period. This should be clarified once all results for the full peak 2020/21 season have been analysed, as should clear reporting against the other BAP targets relating to sanderling and royal tern and annual IBA 'Pressure-State-Response' data. The key issue with establishing warning thresholds for sanderling is understood to be the uncertainty over the baseline count and how representative this is, as extremely large congregations such as those observed in Nov 2015 have not been recorded at any point since that time, either along the shoreline in the Project AoI or at Amansuri estuary. It is understood that during 2020/21 Eni Ghana doubled the number of observation days each month to increase the chance of observing a similar extreme congregatory event, but numbers remained relatively low. For this reason the IESC agrees with Eni Ghana's suggestion that it would be appropriate to 'reset' the baseline using the last 5 years monitoring, which should be sufficient to allow the identification of any drop in abundance during the construction period. Eni Ghana should seek WBG agreement prior to any such reset of the baseline.

11.3.2 Research on Regional Shorebird Movement

The Q1 2021 QMR notes that engagement with the Centre for African Wetlands (CAW) took place during a one-day meeting in February 2021 to discuss a long-term collaborative demographic study of shorebirds using consistent biological research techniques. This meeting involved representatives of Eni Ghana, ESL Consulting, FFI, Wildlife & Human Resources Organisation (WHRO) and CAW. CAW undertakes monthly monitoring of shorebirds at the Ankobra estuary, where shorebirds from the Amansuri estuary are believed to undertake localised migrations in order to forage.

During the VSV, it was revealed that a Memorandum of Understanding (MoU) between ESL Consulting /WHRO and CAW has been put together in line with Birdlife International guidance and is currently under review by Eni Ghana. Terms of Reference (ToR) for this were provided for IESC review and appear in line with the stated BAP targets to study regional movements of sanderling and royal tern to support shorebird management and community education programmes, which is stated in the BAP as a programme to be initiated in 2021. The IESC recommends that Eni Ghana clarify its contribution to this MoU, as this is not clear from the ToR reviewed, nor has it been signed by an Eni Ghana representative.

11.3.3 Hooded Vulture Monitoring

Vulture surveys were conducted at all known reported feeding and roosting sites within the Project AoI during the months of June and November 2020, in accordance with the schedule set out in the Avian BAP. A draft end of season report was provided to the IESC for review, including reporting of progress against the BAP targets. A total of 20 locations in 12 communities were surveyed. Locations where vultures were directly encountered in previous surveys, in addition to sites where local community members reported recent sightings, were subject to repeat visits.

A total of 133 individual hooded vultures were encountered in a total 74 visits made to all sites over the 2 months of survey within the reporting period. In June, 97 vultures were recorded compared to 36 in November. This drop in numbers toward the end of the year is in line with previous observations within the Project AoI, where vultures were encountered in the forest area as well as along the beaches. Out of the 20 sites visited, vultures were encountered in 17 sites.

Offshore Cape Three Points

In common with previous surveys, including the pre-construction survey, no vulture nests were recorded in the onshore concession area during the reporting period. Vultures in the survey area were noted to prefer sites with piggeries, refuse dumps and tall coconut trees and highest numbers were found in the community of Esiama. In accordance with the BAP, baseline condition is taken to be peak season averages for Ngalekyi, Eikwe and Sanzule. The numbers of vultures recorded during the reporting period remains low compared to the pre-construction baseline, and target numbers as set out in the Avian BAP, and although being exceeded at Eikwe, are not being met for two Ngalekyi and Sanzule. This is primarily attributed to hunting and poisoning by the local community members, general habitat degradation along the beach and in the forest and also removal of refuse dumps to improve sanitation. A campaign to raise community awareness of vulture conservation is being planned (see Section 11.3.5).

It is recommended that the vulture reports are timed for January, following the December surveys, and that this reporting includes the forest bird results (see below). Although this will mean that there will be no integrated reporting of all avian surveys this proposed timing will allow any necessary adaptive management actions to be taken at the earliest opportunity following analysis of survey results.

11.3.4 Forest Bird Monitoring

Ongoing forest bird monitoring is part of the Production Phase Avian BAP. Surveys were undertaken in the wet and dry seasons (June and December) in 2020, in accordance with the BAP schedule, in representative habitat in the Project area. The three transects used for previous monitoring were repeated to ensure comparability of data. A draft end of season forest bird monitoring report was provided for review.

A total of 1,155 individual birds belonging to 66 species were recorded in June while December recorded 1,744 individual birds from 69 species. Overall, 82 species were recorded across both seasons. Overall abundance of birds compares favourably with previous surveys, including the pre-construction survey, with the highest total counts since monitoring commenced. Although the number of species recorded is lower than both pre-construction and the post-construction survey conducted by Envaserv in 2019, copper-tailed starling (*Hylopsar cupreocauda*), which is listed as Near Threatened has been recorded again for the first time since the pre-construction survey, when a single observation was made. Three non-breeding individuals of this species were recorded during the reporting period, two in June and one in December. All other species recorded during the reporting period are Least Concern according to the IUCN Red List of Threatened species, with the most common being the village weaver (*Ploceus cucullatus*).

In common with the 2019 post-construction survey, the results indicate that the population structure of forest birds has not changed significantly from pre-construction levels. The presence of copper-tailed starling during both the wet and dry season surveys means that the BAP Performance Indicator of at least one priority species being identified in each survey is being met for the first time since the pre-construction survey.

Improving habitat suitability for forest birds forms part of the NNL Strategy (see Section 11.4).

11.3.5 Community Awareness

The Q4 2020 QMR reported that ESL conducted community awareness activities on bird monitoring activities during that period, following strict COVID-19 protocols.

During the VSV, ESL revealed that they have drafted the content for vulture awareness signage (Figure 11-2) and that it is currently under review in readiness to commence the vulture conservation awareness campaigns, for which there are biannual BAP targets for participation

Offshore Cape Three Points

from at least 75 community members from the five communities where vultures are most abundant (Asasetre, Ngalekyi, Esiama, Eikwe and Nkroful).

ABOUT VULTURES



- Vultures are birds of prey that feed on animal carcasses.
- Vultures typically have bald head devoid of feathers.
- The bare skin on the head keep the head clean when feeding.
- Vultures have a large, hooked beak, which makes tearing and eating flesh easier.
- Vultures become sexually mature at 5-7 years.
- Vultures usually lay 1-3 eggs.
- Female vultures can produce offspring once every 1-2 years.
- Vultures incubate their eggs for 38-68 days.
- Only 1 out of 10 vulture chicks survive their first year.
- Vultures have very good eye sight and very keen sense of smell which help them to locate their food.
- Vulture like tall trees such as coconut trees.



VULTURES ARE IMPORTANT

Vultures are important because they:

- Maintain healthy environments
- Reduce water contamination.
- Reduce accumulation of toxins from breeding micro-organisms in carrion.
- Support efficient nutrient recycling.
- Have cultural significance.





Hunting



Habitat Destruction

VULTURES ARE DISAPPEARING

The numbers of vulture around the world, and in Ghana are reducing.

The following are some of the causes;

- Habitat destruction /deforestation: - such as cutting of coconuts to build houses.
- Hunting/Poaching:- Vultures are killed for food and for sale.
- Poisoning:- Vultures are killed with DDT on farms and piggery areas.
- Traditional Medicine:- Vultures are killed for traditional medicine.
- Wrong cultural beliefs:- Vultures are seen as evil creatures that represent death and are therefore killed.

VULTURES NEED YOUR HELP

You can help protect vultures by doing the following:

- Avoid trapping or killing vultures.
- Avoid eating vulture.
- Avoid destroying any vulture habitat including coconut plantations.
- Do not poison vultures.
- Do not use vulture products for traditional medicine.

HELP PROTECT VULTURES



Figure 11-2: Draft Vulture Signage

Signage to raise awareness for shorebirds is now in place at Amansuri Estuary, demonstrating progress relating to the BAP action to redevelop shorebird education and awareness materials (see Figure 11-3). The end of season shorebird report notes that as part of the Memorandum of Understanding being developed with CAW (see Section 11.3.2), the Project will work with CAW to undertake avifauna education in the Project area and immediate surroundings.

Offshore Cape Three Points



Figure 11-3: Avian Awareness Signage at Amansuri Estuary

11.3.6 Bush Meat Action Plan

The Bush Meat Action Plan, which includes measures to prohibit employees and contractors from hunting vultures or possessing vulture carcasses, continued to be implemented during the reporting period. The IESC was informed verbally that to date, no Eni Ghana workers or contractors have been recorded in breach of the Bushmeat Action Plan. The IESC will seek documented evidence during the next site visit to confirm appropriate mechanisms are in place to identify and record breaches and subsequently verify the statement.

11.3.7 Staff Training

It is understood that no new staff were hired over the reporting period and that therefore no induction training on birds took place. The 2020 AMR reports that a total of six existing staff (three Contractor and three Company) undertook 'Biodiversity Refresher Training'. Training attendance sheets were provided at the time of the virtual monitoring visit, though these appear to relate to training sessions held on 15th June 2016. The IESC notes, however, that an attendance sheet for biodiversity refresher training was provided as Annex 2 to the Avian BAP which indicates that this training of six Eni Ghana staff was delivered by ESL on 11th September 2020.

Documentary evidence of the training was provided for review, including a transcript of the training on birds. The material contained within this training is quite generic, therefore the IESC recommends that specific information is added relating to the key bird species of interest in the vicinity of the Project site and Eni's commitments relating to these, in line with the requirements of the Avian BAP.

Offshore Cape Three Points

11.4 No Net Loss Strategy for Natural Habitat

A PowerPoint update on the Natural Habitat NNL Implementation Plan, prepared by Eni Ghana and, Eni HQ as presented to the IESC during the virtual monitoring visit.

The finalised NNL Strategy was also provided to the IESC for review and has been informed by consultation by internal stakeholders in Eni Ghana and external habitats and species experts. According to calculations therein, No Net Loss is now calculated as achievable solely through on-site actions, including revegetation of temporarily cleared areas, protection of existing natural habitat and enhancement (naturalisation) of modified habitat within the concession. Project losses of habitat were calculated as 8.4 Quality Hectares (QHa), to be offset by the planting of 30.2QHa, which should eventually result in a Net Gain once established. Areas used for livelihood restoration were assessed to have minimal effect on Natural Habitat, with only 11 out of over 300 sites assessed as affecting Natural habitat (each <0.1ha); therefore it is considered that this can readily be absorbed by the overall estimated gains of 30.2QHa from the combined actions of restoration, enhancement of currently modified areas and protection of existing natural habitats, with no additional actions necessary to specifically to address the effects of the livelihood restoration. The IESC agrees with this approach.

The Avian BAP contains an action to improve the suitability of habitat within the ORF for forest birds through restoration and habitat enhancement measures, and the NNL Strategy addresses this through plans for habitat enhancements within the existing modified habitat areas. This includes encouraging the formation of suitable habitat, e.g. using woodpiles, planting tree species favoured by forest birds and installing artificial nest boxes.

The IESC notes that a full NNL Implementation Plan including Key Performance Indicators and monitoring measures is due for completion by end 2021. This is reflected in the updated NNL strategy timeline (Figure 11-4) which shows good progress. The outline contents of this plan were presented during the virtual monitoring visit and appear appropriate.

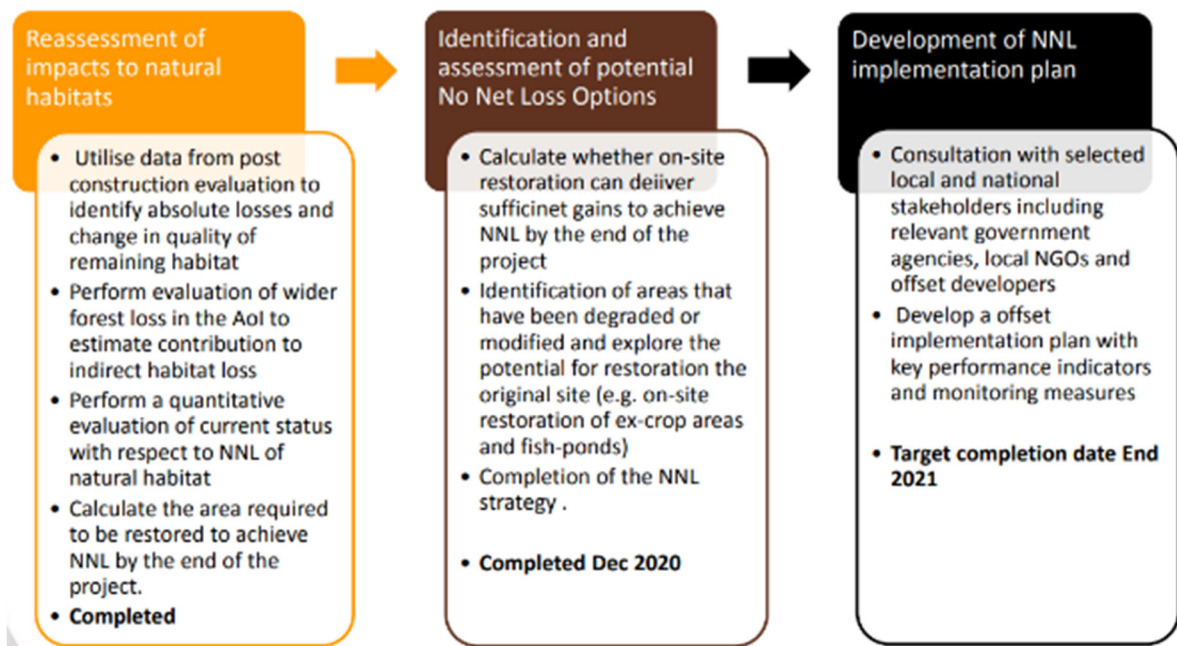


Figure 11-4: Updated NNL Strategy Timeline

Offshore Cape Three Points**11.5 Vegetation Reinstatement and Alien Invasive Species**

The 2020 AMR reports that the plant nursery at the ORF was managed effectively to have an ample supply of the required indigenous saplings for ongoing revegetation works. Photographic evidence of the nursery area was provided to support this.

The Q3 and Q4 2020 and Q1 2021 QMRs report that monitoring of revegetated sites and removal of AIS by ESL continued at the ORF site with strict compliance to all COVID-19 protocols. Current restoration activities, which comprise revegetation of temporarily cleared areas, are expected to contribute significantly toward No Net Loss in the long term, as outlined above.

The Q1 2021 QMR reported that following documents were undergoing revision to align with the NNL Strategy and it was confirmed during the virtual monitoring visit that these are at final review stage:

- Flora Conservation Plan;
- Reinstatement and revegetation standard; and
- Prevention and control of Alien Invasive Species (AIS) standard.

Revegetation and AIS management will remain ongoing activities and include quarterly monitoring, which is in line with the requirements of the Production Please Biodiversity Management Plan and includes monitoring of saplings and ground cover, and replanting as required. Revegetation to date appears largely successful, as indicated by the examination of recent photographs of revegetated areas. Some bare patches are evident (e.g. Photo 4 of Photolog, Appendix 5) which will require attention, and some old protective plastic sheeting remains in the berm area and requires removal (Photo 8 of Photolog, Appendix 5), though it is understood that this is planned.

It was reported during the VSV that imported topsoil has introduced the invasive species *Imperata cylindrica* to the site and it is understood that options to control this and prevent its further spread are under discussion. Eni Ghana indicated that no further importing of topsoil is planned. The IESC notes that if this situation changes it will be important to verify the source of topsoil to avoid further AIS introductions.

Other invasive plant species *Chromolaena odorata* and *Leucaena leucocephala* appear to be being successfully controlled and photographic evidence was provided to demonstrate this, including evidence of controlled disposal to avoid spread.

11.6 Site Drainage and Erosion Control

In its previous monitoring visits the IESC expressed a concern over the positioning of culverts (short pipe sections) beneath the access road close to the tie-in with the GNGC pipeline, as these were considered to be positioned too high to maintain hydrological connectivity when swamp water level falls in the dry season. The positioning of these pipes has not changed and monitoring by ESL to date has not demonstrated any deleterious effect on the adjacent swamp habitat, possibly as a result of the porosity of the road itself allowing free movement of water even when the level is below that of the pipes. The hydrological balance therefore appears to be being maintained and any periods of dryness are caused by natural seasonality rather than disruption to connectivity. It is, however, understood that quarterly monitoring of hydrological connectivity and swamp habitat condition will continue to allow for remedial action to be undertaken relating to the positioning of the pipes if it becomes clear that this is necessary.

The area of surface water discharge from the ORF site, previously noted to be eroded and posing a risk to adjacent wetlands during the September 2018 IESC site visit, appears to have been successfully remediated as indicated by photographic evidence (see Photos 1 and 2 in Photolog, Appendix 5). It was also explained during the Environmental Monitoring session of the VSV that

Offshore Cape Three Points

further erosion control measures are planned to address other areas where there is continued high sedimentation on site (see Section 8.2.1).

11.7 Marine Monitoring

No fish catch or plankton surveys were conducted during the reporting period, though these surveys are not required as part of the Production Phase Biodiversity Management Plan, and no formal grievance relating to reduced catch success has been raised by fishermen.

A transcript of training provided by a specialist from the University of Ghana to FPSO staff on 19th February 2021 was provided for review. Incidental sightings of marine mammals were reported by FPSO staff following training, and records continue to be kept in line with the Marine Mammal and Sea Turtle Protection Policy and Plan (MMSTPPP). Sightings were made on in September and November 2020, and this documentation was provided on request. Both sightings related to relatively large pods of dolphins (30 in September, 50-80 in November), passing the FPSO and appeared to be exhibiting normal porpoising behaviour with no signs of disturbance.

No sightings of sea turtles were made during Project offshore operations, though fishermen reported bycatch of turtles, most of which are understood to have been made offshore and released alive.

Eni Ghana confirmed that prior to any additional noise-generating operations (e.g. drilling), dedicated watches are planned to check the area is clear of marine mammal activity prior to commencement of the activity. In addition, the IESC recommends that a risk assessment should be conducted at the early planning stage for such noise-generating activity in order to consider additional impact avoidance measures which may be possible, such as the timing of the works to avoid key periods of known sensitivity (see also Section 6.11, Management of Change). The IESC also recommends that any new vessels on site should be briefed in the requirements of the MMSTPPP, including speed limits and maintaining distance. This will require the development of specific training materials for vessel operators already on site as well as the operators of any new vessels, with a focus on the protection measures to be adopted during vessel activity.

Offshore Cape Three Points

Table 11-1: Summary of Findings, PS6

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
021_05/21	Biodiversity staff training records	Not all training listed could be verified making it difficult to track BAP targets relating to training.	PS6	Transcripts and correctly dated attendance records should be kept for all training sessions held, with a date clearly shown.	Minor (continuing)
022_05/21	End of Season shorebird monitoring report	The end of season monitoring report provided for shorebirds covers the period from June 2020 to February 2021; however the peak season against which BAP targets are measured extends from September to April, therefore the logical timing of the end of season report would be May. Similarly, the logical timing of the end of season vulture and forest bird report would be the January, following completion of the December surveys.	PS6	Confirm that the final End of Season shorebird monitoring report each year will be prepared following the month of April, when all peak season data has been collated to ensure that it includes clear reporting against all BAP targets for shorebirds. In addition, confirm that the end of season report for vultures and forest birds will be January, following completion of the December surveys.	Minor (Q1/Q2, 2022)
023_05/21	Staff training on birds	The subject of the staff training material for birds lacks the specifics of key bird species of interest in the vicinity of the Project site and Eni Ghana's commitments relating to these.	PS6	Specific information should be added relating to the key bird species of interest in the vicinity of the Project site and Eni Ghana's commitments relating to these, in line with the requirements of the Avian BAP.	Minor (Q3, 2021)
024_05/21	AIS and topsoil management	Although it is understood that no further importing of topsoil is planned, there will need to be robust mechanisms in place to ensure no further introductions of alien invasive species occur.	PS6	Confirm that the Prevention and Control of AIS Standard which is in the process of finalisation will include measures to prevent the accidental introduction of AIS, including recognition that if any additional material is brought to site its origin will be verified to ensure it is not resulting in AIS introduction.	Minor (Q3, 2021)

Offshore Cape Three Points

025_ 05/21	Marine Mammal and Sea turtle Protection Policy and Plan	In addition to incidental sightings of marine mammals and sea turtles, it is noted that further noisy works may occur during the production phase, therefore it is noted that there will also be a need to conduct dedicated watches prior to such works to ensure the area is clear before start-up.	PS6	Ensure that records are kept relating to the scheduling of noisy works to avoid key sensitive periods for marine mammals and sea turtles and the briefing of any new vessels, including drill ships, coming to site on the requirements of the MMSTPPP, including the delivery of specific training on the importance of maintaining distance and using dedicated navigation channels where applicable. Records should also be kept of dedicated watches prior to new noisy works such as drilling events.	Minor (continuing)
---------------	---	---	-----	--	------------------------------

Offshore Cape Three Points

12. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

During the IESC's September 2018 monitoring visit, the IESC was informed, with respect to the protection of nearby shrines and, also, the Royal Cemetery, that this issue was being 'considered' as part of CIS implementation.

During discussions on the LDPj-CIS initiative, as part of the May 2021 VSV, the IESC was informed that, as a component of actions to complete the educational project's infrastructure component (see Section 6.5.2), work will be done to construct the fence at the Royal Cemetery. This has been an outstanding action since 2017 and the IESC welcomes this commitment to implement the fencing to help protect this important item of local cultural heritage.

APPENDIX 1 ENVIRONMENTAL AND SOCIAL ACTION PLAN

Updated ESAP - 01 February 2018 to replace the version updated 16 June 2017. IESC NOTE: Status changes highlighted in **yellow**.

	Task	Indicator of Completion	Timeframe
1	Eni Ghana with support from Vitrol will develop a construction/ development phase Environmental, Social, Health Management Plan (ESHMP) and the relevant management plans and programs in advance of development drilling and construction, followed by a production/operations ESHMP which will be developed before first oil, with gas-related elements integrated as needed before first gas. The ESHMP will be updated as required, such as in the event of any significant changes to the project and its environmental and social risks and impacts occur, following a Management of Change process. The ESHMP will include social management plans and procedures to meet the objectives of the Performance Standards, and those plans and procedures will be incorporated into an integrated Environmental and Social (E&S) Management System for the OCTP project.	Plans and procedures submitted to WBG: a) Development drilling and construction phase: ESHMP, Procurement Plan, Grievance Mechanism, Waste Management Plan, Security Management (Offshore) Strategy by November 15, 2015 b) Recruitment, Employment and Training Plan, Local Content Development Plan, Workers Development Plan, Marine Traffic Management Strategy, Commitment Register by end of November 2015 c) Development drilling and construction phase: all management plans (others than the plans specified in the action items below) approved by end of December 2016 d) Phase-1 commissioning and production operations: by end of August 2017 or one month prior to commissioning / production operations whichever comes first e) Phase-2 commissioning and production operations: by end of July 2018 or one month prior to commissioning / production operations whichever comes first.	a) 11/15/2015 – Complete b) 11/30/2015 - Complete c) 12/31/2016 Complete d) 08/31/2017 or one month prior to commissioning / production operations whichever comes first - Complete e) 07/31/2018 or one month prior to commissioning / production operations whichever comes first
2	Eni Ghana will require that contractors adopt measures and bridging documents to ensure that their management systems are compatible with HSE Policy, guidelines and procedures and the project ESHMP.	Evidences (i.e., approved bridging documents) collected and submitted to WBG.	12/31/2015 – Complete and ongoing
3	Eni Ghana will implement well integrity and control strategies and develop specific Well Control Emergency Response Plans for each well drilled. All drilling programs will be approved by eni headquarters (that will act as independent, expert third party in charge of verification/review).	a) WCEMP applicable to the first three wells drilled approved by eni headquarters and submitted to WBG by September 2015, and evidences of implementation of the third party verification/review of the drilling programs by October 15, 2015 b)) Auditable evidences of implementation provided to WBG in the Annual Monitoring Report.	a) 10/15/2015 - Complete b) 12/31/2017 Note. This indicator of completion will be applicable to GI-3 well drilling, planned for the future.
4	Eni Ghana will develop the specific E&S monitoring plans. A number of pre-construction surveys will be implemented, including: (i) preconstruction fish catch surveys at Sanzule and in the project area of influence, with specific focus on beach seine fishing activities; (ii) phyto- and zooplankton surveys (near the same time as the catch surveys and focusing on fishing grounds); (iii) ambient air quality and noise	a) Terms of reference of the time sensitive surveys (birds and sea turtles) submitted to WBG by end of October 2015	a) 10/31/2015 - Complete b) 06/30/2016 - Complete

	Task	Indicator of Completion	Timeframe
	monitoring in the area of influence of the ORF; (iv) preconstruction survey of sensitive avian species that may be present, particularly during the boreal winter.	b) Pre-construction surveys and monitoring plans submitted to WBG.	
5	Eni Ghana will report on their best efforts to engage other developers, local institutions and government, and other stakeholders in designing coherent management strategies to mitigate cumulative impacts.	a) Cumulative impact mitigation strategy submitted to WBG b) Evidences of implementation provided to WBG as part of the Annual Monitoring Report	a) 11/30/2015 - Complete b) 12/31/2016 - Complete
6	Eni Ghana will update and refine the air emission dispersion and noise propagation modeling during production facility final design to inform the identification and development of a package of air emission reduction measures.	Modeling updated and submitted to WBG during production facility final design and by anticipated completion date.	10/31/2017 - Complete
7	Eni Ghana will develop and enforce a policy and relevant procedures to ensure that operations of drillship, support vessels and helicopters minimize disturbance to marine mammals and turtles.	Policy and procedures submitted to WBG.	12/31/2015 - Complete
8	Eni Ghana will maintain a quantification program for GHG emissions, according to an internationally recognized emissions estimation methodology, and will establish annual review programs to identify areas of improvement and GHG emission reduction. Eni Ghana has committed to implement a Zero-Permanent Flaring policy, and will implement measures for minimization of venting and flaring (consistent with the Global Gas Flaring and Venting Reduction Voluntary Standard) and minimization of fugitive emissions.	a) Quantification and minimization program for GHG emissions submitted to WBG b) First annual report by anticipated completion date.	a) 10/31/2017 - Complete b) 12/31/2017 - Complete
9	Eni Ghana will include an environmental lead as part of the oil spill response team and will develop a clear mechanism of escalation of response effort based on coastal and biodiversity sensitivity. Mutual aid agreements with other operators in Ghana will be established.	Evidences of implementation (i.e., approved revised OSCP) submitted to WBG.	12/31/2015 - Complete
10	Eni Ghana with the support of Vitol will develop and implement a Livelihood Restoration Plan (LRP) for affected people in the community of Sanzule. Once all mitigation measures have been substantially completed and displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods, eni Ghana will undertake a completion audit comparing outcomes against objectives of the plan and current living conditions against living conditions prior to the start of the project. eni Ghana will develop a Land Acquisition and Compensation Framework for any potential additional land acquisitions that may be required for the project or future expansions.	a) LRP workshop held b) Draft final LRP submitted to WBG c) Final LRP submitted to WBG d) Update report by Eni Ghana/Vitol on actions taken (e.g., financial training, food aid, education and health support, stakeholder engagement, feasibility studies by the 4 NGOs). The report will also summarize implementation issues faced in 2016-2017 and lessons learned. e) Evidences of implementation included in the periodic E&S progress reports and Annual Monitoring Report	a) 10/31/2015 - Complete b) 11/30/2015 - Complete c) 12/31/2015 or six weeks prior to construction early works whichever comes first - Complete d) 02/28/2018 - completed e) Based on LRP f) 03/31/2019 - Complete g) Finalization report: at the completion of the LRP

	Task	Indicator of Completion	Timeframe
		<p>f) Interim Implementation Audit carried out by an external competent resettlement professional and report submitted to WBG</p> <p>g) Finalization report by implementing organization submitted to WBG and Completion Implementation audit carried out by an external competent resettlement professional and report submitted to WBG</p>	<p>Completion audit: One year after the completion of the implementation of the LRP</p>
11	<p>Eni Ghana with the support of Vitol will develop a Fisheries Management Plan (FMP) to ensure fishermen are compensated appropriately and assistance for improving or at least restoring their living conditions is provided. The FMP will be monitored throughout its implementation to its completion. A participatory monitoring program will be developed with the involvement of local fishermen. The plan will also include a compensation framework in line with PS 5 in case fishers are adversely impacted by an oil spill.</p>	<p>a) FMP strategy submitted to WBG.</p> <p>b) FMP submitted to WBG.</p> <p>c) Evidences of implementation of the FMP and participatory monitoring program included in the Annual Monitoring Report.</p>	<p>a) 12/31/2016 Complete</p> <p>b) 5/31/2017 or 2 months prior to construction sea pipeline whichever comes first - Complete</p> <p>c) 12/31/2017 Complete</p>
12	<p>Eni Ghana with the support of Vitol will develop a Biodiversity Management Plan (BMP and relevant Biodiversity Action Plans) and will implement it, in collaboration with recognized species specialists. Seasonal constraints, associated with peak turtle nesting season between October and February and with dwelling season of the IBA triggering species, will be incorporated in the construction and operation management plans.</p>	<p>a) BMP submitted to WBG, including identification of opportunities to enhance conservation of priority bird species (including specific focus on the hood vulture) and/or habitat in the project area</p> <p>b) BAPs for sea turtles and for birds submitted to WBG</p> <p>c) Evidences of implementation of the BMP / BAPs included in the Annual Monitoring Report.</p>	<p>a) 07/31/2016 - Complete</p> <p>b) 11/30/2016 - Complete</p> <p>c) 12/31/2017 - confirmed</p>
13	<p>Eni Ghana will ensure that support helicopters will routinely avoid flying over the sensitive areas of Amansuri wetland and that, if avoidance is not feasible due to weather conditions, a minimum altitude will be specified, according to international good practice, when flying over this area to minimize disturbance to wildlife.</p>	<p>Evidences of avoidance (i.e., helicopter flight plans and relevant language on flights associated with emergency/oil spill response drills in the revised BMP - see Action Item 12) provided to WBG.</p>	<p>05/31/2016 - Complete</p>
14	<p>Eni Ghana and Vitol Ghana, as partner of the OCTP project, will develop and implement a community investment strategy for the area of influence of the project by identifying areas of potential social investment based on community assets and needs. The community investment strategy will be developed in consultation with local and regional stakeholders.</p>	<p>a) Community investment strategy submitted to WBG</p> <p>b) Final Community Investment Strategy submitted to WBG</p> <p>c) Updates and evidences of implementation of the strategy included in the Monthly E&S Reports and Annual Monitoring Report.</p>	<p>a) 12/31/2015 - Complete</p> <p>b) 10/31/2017 - Complete</p> <p>c) 12/31/2018</p>
15	<p>Eni Ghana and Vitol Ghana, as partner of the OCTP project, will hire an independent E&S consultant (IESC) to monitor and report on implementation of this E&S Action Plan and compliance with Performance Standards and E&S commitments. The monitoring visits will be carried out biannually (every six months) during development</p>	<p>a) IESC's Terms of Reference submitted and approved by the WBG, and IESC hired</p> <p>b) First monitoring visit and report submitted.</p>	<p>a) 12/31/2016 - Complete</p> <p>b) 03/31/2017 - Complete</p>

	Task	Indicator of Completion	Timeframe
	drilling and annually during production operations. The reports of the IESC will be published.		
16	Vitol Ghana will assign an E&S assurance manager to the OCTP project to oversee environmental, health, safety and social aspects, ensuring compliance with Performance Standards and project E&S commitments.	E&S assurance manager appointed.	10/31/2015 - Complete
17	Vitol Ghana will develop and adopt a Human Resource Policy.	Human Resource Policy submitted to WBG.	12/31/2015 - Complete
18	Vitol Ghana will update its security policy to be aligned with the Voluntary Principles on Security and Human Rights.	Policy submitted to WBG.	12/31/2015 - Complete

APPENDIX 2 PROJECT DOCUMENTATION PROVIDED FOR REVIEW

Document Title	Reference/Company	Issue/Effective Date
LRP Completion Strategy (Draft)	Eni Ghana	March 2021
Eni Livelihood Restoration Project: Draft Endline Report (drafted by TechnoServe)	Eni Ghana and TechnoServe	February 2021
LRP Monitoring Data (undated spreadsheet)	Eni Ghana	No date given
Livelihood Restoration Project: Performance Management Plan (drafted by TechnoServe)	Eni Ghana and TechnoServe	No date given
Livelihood Restoration Project: Annual Report 2020 (drafted by TechnoServe)	Eni Ghana and TechnoServe	February 2021
Eni Livelihood Restoration Project: Draft Baseline Report (drafted by TechnoServe)	Eni Ghana and TechnoServe	October 2018
Fisheries grievances (x4 on same issue of the unrecovered anchor). Close-out forms (x3)	Eni Ghana	December 2020
Water Quality Test Results (re Water Supply Project) (x2)	Ghana Water Company Ltd	15 October 2020 and 11 May 2021
Local Development Project (LDP); Community Investment Strategy (CIS)	Eni Ghana	November 2019
Security Management Plan: Offshore/Onshore (Version_05)	Eni Ghana	24 July 2020
OCTP Annual Monitoring Report 2020 (and numerous embedded documents)	Eni Ghana	19 March 2021
OCTP Q1 Quarterly Monitoring Report 2021 (and numerous embedded documents)	Eni Ghana	22 April 2021
Sea Turtle Biodiversity Action Plan	Eni Ghana	18 November 2020
Avian Biodiversity Action Plan	Eni Ghana	27 November 2020
Eni Sea Turtle Monitoring EoS Summary Report (Draft)	Eni Ghana	March 2021
Eni Forest Birds Monitoring EoS Summary Report (Draft)	Eni Ghana	March 2021
Eni Vulture Survey Monitoring EoS Summary Report (Draft)	Eni Ghana	March 2021
Eni Shorebird Monitoring EoS Summary Report (Draft)	Eni Ghana	March 2021
No Net Loss Strategy for Natural Habitat	Eni Ghana	1 October 2020
Memorandum of Understanding between ESL Consulting / Wildlife & Human	ESL Consulting	2021

Document Title	Reference/Company	Issue/Effective Date
Resources Organisation (WHRO) and Centre for African Wetlands (CAW)		
Stakeholder Engagement on Light Pollution Along Nesting Beaches (Draft Report)	Eni Ghana	March 2021
prog ms hse 001 eni ghana – 2021 HSE Audit Program	Eni Ghana	Jan 2021
Revised AMR and QMR Template	WBG	April 2021
Emergency Response Plan - Emergency drills 4Y plan. Annex L pln ms hse 002 eni ghana r17	Eni Ghana	Not specified
Pandemic Preparedness and Response Plan: Novel Coronavirus pro-hlt-pprp-027-r02	Eni Ghana	March 2021
Management of Change Procedure Pro ms hse 017 eni ghana r03	Eni Ghana	April 2021
Permits database (spreadsheet)	VUGL	27 May 2021
Eni Ghana / Saipem Offshore – Saipem 10000 Drillship HSE Bridging Document	Eni Ghana	April 2021
HSE Inspection Report – DS Saipem 10000	Eni Ghana	30 April 2021
Medical Facility Assessment Form - OFFSHORE (conducted for Saipem 10000)	Eni Ghana	24 April 2021
Regulatory check list for EBAN 1X well drilling campaign	Eni Ghana	24 March 2021
2021 HSE Training Plan (spreadsheet)	Eni Ghana	Unknown
Zoil Services Limited - HSE Audit Report rep ms hse 127 eni ghana	Eni Ghana	29 April 2021

APPENDIX 3

MONITORING VISIT ITINERARY

Day 1 - Monday 10th May

	HSE	Social	Biodiversity
13.00 - 15.00	<p>Opening Meeting</p> <ul style="list-style-type: none"> - Introductions - Scope of VSV and logistics <p>Eni to present project status update including:</p> <ul style="list-style-type: none"> - main facilities - TTIP (Eni’s remaining involvement, if any) <p>HSE and SLC organigrammes</p> <ul style="list-style-type: none"> - roles and responsibilities - Contractors 	See HSE column	See HSE column
15.30 – 17.30		<p>Community grievance management data:</p> <ul style="list-style-type: none"> • Eni Ghana and Contractors • # closed/open (actions being taken to resolve open grievances) • Average time to close grievances (2020) <p>Operations Phase SEP:</p> <ul style="list-style-type: none"> • Implementation – local, regional, and national • Regularity of reporting to stakeholders • Community/other stakeholder liaison • Themes/Issues/challenges at each level 	
17.30		15 minute recap	

Day 2 - Tuesday 11th May

	HSE	Social	Biodiversity
09.00-12.00	<p>HSE statistics/performance (2020 to date)</p> <ul style="list-style-type: none"> - training - new initiatives <p>COVID 19 protocols, incl implementation</p> <p>Internal audit programme/ findings</p>	<p>Community Labor Relations Officer:</p> <ul style="list-style-type: none"> - Worker grievances - Demobilization issues - Demobilization monitoring/reporting <ul style="list-style-type: none"> • Changes made to monitoring/survey approach <p>Demobilized DAoI workers and integration into rural economy</p>	
	Lunch break	Lunch break	Lunch break
13.00 - 15.00	<p>Security Management</p> <ul style="list-style-type: none"> - Fishing boat incursions, - MOUs, - security providers (including police deployment) - SMP status etc. <p>Contractor compliance with SMP</p>	See HSE column	<p>Discussions with ESL and Eni Ghana on biodiversity</p> <ul style="list-style-type: none"> ○ Bird monitoring ○ Turtle monitoring <p>Implementation of other current BAP actions (with participation from FFI)</p>
15.30-17.30	<p>MoC register</p> <p>Permitting status update</p>	<p>LR Programme: Status (Session 1)</p> <ul style="list-style-type: none"> - How is livelihood restoration managed/implemented? <ul style="list-style-type: none"> • Role of TNS or successor - Options 1 and 2 status (#s generating revenue by PAP category: all PAPs and vulnerable PAPs) - Electricity connections to 'option' sites/facilities - Status - Support provision to PAPs generating no/insufficient revenue <p>LRP interim audit:</p> <ul style="list-style-type: none"> - Implementation of corrective actions 	
17.30		15 minute recap	

Day 3, Wednesday 12th May

	HSE	Social	Biodiversity
08.30-10.30	CH to join biodiversity session	Fishery Management Plan Delivery Officer: <ul style="list-style-type: none"> - Fisheries issues - Current/future challenges - Incursions into exclusion zones Management of cumulative impacts	Waste management Update on fish catch monitoring Marine mammal and sea turtle encounters reported as part of MMSTPPP ESL to participate in biodiversity talks
10.30-12.00	CH to join biodiversity session		Strategy for NNL Eni HQ biodiversity specialist to participate
	Lunch break	Lunch break	Lunch break
13.00 - 15.00	Virtual site walk over <ul style="list-style-type: none"> - ORF facilities <ul style="list-style-type: none"> o Permanent accommodation facility o Beach area (landfall) o Reinstatement areas (list to follow) o Former contractors workshop area o Outfall of the ORF o Live video the RoW reinstatement o Nursery o Site drainage/outfalls o Former topsoil stockpiles [PL, DZ, AF] ATEX phones available where needed	LR Programme: Status (Session 2) <ul style="list-style-type: none"> - Livelihood restoration progress: Monitoring and evaluation: <ul style="list-style-type: none"> • Approach - Current status of livelihood restoration by PAP category (all PAPs and vulnerable PAPs) - Strategy /actions going forward - Evaluation of TNS performance 	Virtual site walk over to include turtle hatcheries in addition to areas listed in HSE column [AF]
15.30-17.00	Continuation of virtual walk over (see above) [PL, DZ, AF] This session could be used for live streaming	Livelihood Restoration Working Group: <ul style="list-style-type: none"> - Livelihood Restoration to date: <ul style="list-style-type: none"> • Successes/difficulties - Future actions considered necessary 	See HSE column
17.00	15 minute recap		

Day 4, Friday 14th May

	HSE	Social	Biodiversity
0830-10.30	GHG emissions <ul style="list-style-type: none"> - Breakdown of emissions - Initiatives to reduce GHG emissions 		
10.45-12.00	CH to join biodiversity session	TBC Community Investment projects (Session 1): <ul style="list-style-type: none"> - Education <ul style="list-style-type: none"> • 'Catch-up' activities • Asbestos issue - Water supply: <ul style="list-style-type: none"> • Financial Sustainability • Reconstituted Water Committee Water quality	
	Lunch break	Lunch break	Lunch break
13.00 - 14.30	Offshore monitoring campaign for 2021 Environmental Monitoring (onshore) <ul style="list-style-type: none"> - air (including stack emissions monitoring) - surface water - groundwater - treated effluents - noise and vibration (Session to include ESL) Discussions with ESL and Eni Ghana on environmental monitoring (scope, plans, monitoring activities, results) <ul style="list-style-type: none"> - Invasive species - Reinstatement and soil erosion - swamp water levels/effectiveness of culverts 	Community Investment projects (Session 2): <ul style="list-style-type: none"> - Rural clean cook stoves initiative - Economic diversification - Other projects in the pipeline Sanzule/Anwolakrom: Foreseen benefits to community members from CI projects going forward	See HSE – Biodiversity team to join HSE session.
14.45-15.45	Emergency response planning	Influx Management:	

		<ul style="list-style-type: none">- Status of influx in nearby villages - illustrated by recent satellite images and ground-truthing survey results- Actions required	
16.30 – 18.30	Close out meeting		

APPENDIX 4

STATUS OF ISSUES IDENTIFIED IN PREVIOUS MONITORING VISITS

This Appendix presents issues identified during previous site visits/desk-top reviews. Within the ID column, an issue is identified by a composite reference number combining the issue number and year (for example, '001_5/19' which refers to the first issue in the May 2019 report).

Table A1. Issues identified prior to the May 2021 VSV

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
001_11/20	Annual reporting/AMR content	Stricter adherence to the AMR/QMR templates is required as well as additional commentary in certain sections.	Production phase	The IESC also recommends a review of the reporting templates content, noting the changed nature of the Project and a shift in priority areas following the full transition away from construction and drilling activities.	Moderate	Closed (revised AMR/QMR templates approved by WBG. Content will be reviewed following receipt of future AMR/QMRs)
002_11/20	SEQ/SLC resources	Several positions are vacant within the Safety, Environment and Quality team, including the HSE Operations Coordinator. The vacant HSE Operations Coordinator post is a result of a recent departure and a replacement is expected by earlier 2021.	Production phase	The WBG and the IESC should be informed of any interim measures in place whilst the posts are vacant in addition to actions being undertaken to fill the posts.	Minor	Closed
003_11/20	Cumulative impacts	Agreement on the certain aspects of the design of a Cumulative Impact Co-management Platform has yet to be reached by third parties on the Steering Committee. This is	Production phase	Eni Ghana to remain committed to the management of cumulative impacts in cooperation with public and private entities comprising the platform.	NA	Open (This work is progressing but remains open)

		affecting Eni Ghana's ability to engage with the co management platform and thus contribute to the management of cumulative impacts		IESC recognises Eni Ghana's reliance on external parties and the need for such parties to reach agreement.		
004_11/20	ESAP deliverables	Certain plans are still to be finalised, including revision/development of the following plans: the updated Avian Biodiversity Action Plan; the updated Sea Turtle Biodiversity Action Plan; and the No Net Loss Strategy. Consequently, the IESC considers item 1e) of the ESAP to remain 'open'.	Production phase	IESC understands plans are progressing and are close to finalisation. This item is expected to be closed in the near future. No further recommendations necessary.	Low	Closed
005_11/20	Surface water quality	Closer attention should be given to the information requested in the AMR reporting template, noting that data provided to the Environmental Protection Agency (EPA) is requested and therefore should be included in future AMRs.	Production phase	Data presented to the EPA should also be provided to the IESC for review.	Low	Open
006_11/20	Community grievances	LRP-related documents embedded in the 2019 AMR and the Q1 and Q2 QMRs 2020 provide information on the grievances managed by Eni Ghana and those managed by TechnoServe (TNS), the LRP Support Services implementing partner. Previously, data on grievances managed by TNS (restricted to LRP-related	Production phase	All grievances received by the Project (either by Eni Ghana or any of its contractors) - whether escalated by contractors or not - should be recorded in the same manner as grievances received by Eni Ghana are recorded currently.	Low	Closed

		grievances) were not supplied in AMRs/QMRs,				
007_11/20	Community grievances	Four fishery-related grievances appear still to be unresolved and therefore are open (one has been open for a long time – just over 1 year).	Production phase	If an agreement has not been reached on an action to resolve the grievance reached by end 2020, that Eni Ghana proposes to the FMCC that an independent external party be involved to assess the grievance and propose a way forward.	Moderate	Closed (Although closed-out, the complainants have indicated on the 'close-out' form that they are not satisfied with the outcome)
008_11/20	Community Investment Strategy: Quick Impact Projects	With respect to the educational project; there have been delays to a) the capacity-building component and b) the infrastructure component has not yet started	Production phase	Recommendations are: a) Lead for Ghana (LfG), the implementing partner for the capacity-building component, updates regularly, its COVID-19 Student Learning Plan in line with new government measures/restrictions to enable the project to minimize adverse educational impacts from COVID-19. Once, all measures/restrictions are removed then Eni Ghana and LfG should evaluate and then agree actions, if necessary, to facilitate a 'catch up' in the shortest possible time period; and b) Eni Ghana work closely with the selected contractor to reduce any delays related to acquiring the requisite permissions for managing the necessary removal of asbestos during building works.	Low	Closed
009_11/20	Fishery-based incursions into FPSO offshore exclusion Zone	Cumulative totals of incursions for Q3 and Q4 2019 and the totals to date for end June 2020 (with extrapolation for the year 2020) highlight the continuing	Production phase	Incursion monitoring efforts to be continued and analysis and reporting, in both QMRs and AMRs, to be extended to encompass trends in the number of incursions and seasonal effects as well as presenting cumulative totals for	High	Open

		challenge posed by fishing boat incursions into the FPSO offshore exclusion zone and the need for Eni Ghana to continue its efforts to reduce the number of incursions.		defined time periods. Also, to the extent possible, data on the origin of vessels/ownership entering the FPSO exclusion zone should be analysed and trends reported with the incursion data presented in QMRs and AMRs. In addition, Eni Ghana to continue to seek effective means of reducing incursions and documents their efforts in the QMRs and AMRs.		
010_11/20	Livelihood Restoration	There are significant challenges facing Eni Ghana's efforts to restore livelihoods, prior to the ending of the LRP Support Services component of LRP implementation, at the end of January 2021.	Production phase	Eni Ghana to reinforce its efforts to assist those PAPs not generating any revenues and, also, consider preparing an LRP Exit Strategy, for ensuring livelihood restoration for PAPs if future monitoring and evaluation results show that the objective of livelihood restoration cannot be achieved by end January 2021	High	Closed (Draft LRP 'Completion' Strategy' document prepared in Q1 2021 and then implemented)
011_11/20	Air emissions	The IESC has previously reported that emissions are not reported in a manner that allows comparison with WBG emission guidelines. Furthermore, emissions sources reported for the ORF site are the same as for construction and not updated to reflect production phase emissions.	Production phase	Eni Ghana should review major emission sources for the Production Phase, including power generation and compressor system emissions at the ORF, and report these in the format specified in AMR and QMR templates. Eni Ghana should undertake stack emission sampling to confirm limits specified in WBG EHS Guidelines are not exceeded.	Moderate	Open
012_11/20	Frequency of Sea Turtle and Avian Monitoring	AMR and QMR reports have reported the frequency of sea turtle and avifauna monitoring as a single discussion point, leading to ambiguity over the timing of monitoring for each species group.	Production phase	AMR and QMR reports should discuss survey effort for sea turtles and avifauna separately to avoid any confusing relating to which group was the subject of survey in any given period and facilitate the verification that surveys are taking place in accordance with the expected monitoring schedule for each species group	Low	Closed

013_11/20	Staff training on biodiversity issues	No documentary evidence on staff training in relation to sea turtles and avifauna for the review period was provided for review	Production phase	Documentation and reporting of biodiversity-related training going forward. Some training transcripts have now been provided though training content should be reviewed to ensure it meets the requirements of each BAP and attendance sheets with clear date stamps should be kept for each session to demonstrate compliance.	Low	Closed
015_11/20	Offshore biodiversity monitoring	No information reported on the monitoring of marine mammals, sea turtles at sea and fish to demonstrate compliance with the BMP	Production phase	The scope of the further offshore monitoring campaign planned to commence in first half of 2021 should be confirmed during the next site visit. Now confirmed that the offshore monitoring of biodiversity will comprise incidental sightings of marine mammals and sea turtles with dedicated watches as required prior to noisy operations such as drilling. There is no clear driver to recommence fish or plankton monitoring at present.	Low	Closed
001_5/19	Community investment (potable water supply QIP)	Development of more robust management of the potable water supply project	PS1 Construction and Production	Eni Ghana to continue to work closely with the WBC to improve the levy collection/project cash flow and ability of operators to perform their tasks effectively.	Minor	Open (This work is continuing)
004_5/19	T-cards	The T-card system for visitors at the temporary accommodation camp did not accurately reflect visitor presence on site/departure times.	PS1/PS2 Construction and Production	The use of T-cards at the site should be reviewed with consideration of further training for security personnel and provision of additional T-cards to allow for peak visitor numbers.	Minor	Open (IESC cannot opine without a visit to site, however peak numbers

						causing the issue unlikely to be repeated now polit camp is not used for accommodation)
006_5/19	Monitoring of demobilised workers	Reintegration of workforce	PS2 Production	Eni Ghana to: <ul style="list-style-type: none"> a) expand the scope of the survey to include livelihood/income status of the demobilised workers and their households as well as their occupations and means of livelihood; and b) re-consider the survey sampling parameters to be used, in the future, in the context of the needs of the potential users of the data 	Minor	Superseded (See 010_05/21)
009_5/19	Community water quality	Eni Ghana/ESL has not undertaken water level/drinking water quality monitoring from community wells. Eni Ghana indicated that it was not part of ESL's scope to analyse water quality for drinking water parameters, but instead this was the responsibility of the SLC team.	PS3 Construction and Production	Eni Ghana should clarify its position with respect to the monitoring of water quality from community water wells and fulfil the requirements of the Environmental Monitoring Programme (2018). Eni Ghana have provided contradictory information concerning the use of old drinking water wells. Consequently, it is believed some individuals are still using the old wells.	Minor	Open (Remains open unless Eni Ghana can confirm no use of the wells. SLC manages monitoring of water quality for the water supply project)
010_5/19	Project Security SMP	The Project SMP requires substantial revision following the labour unrest in Q1 2018 and, also, in response to the IESC's finding that offshore security	PS4	The Project SMP to be agreed with WBG and approved/signed off as soon as possible. The final SMP needs to include all pertinent international and O&G sector guidance on managing security and be aligned with other	High	Open (The SMP item is expected to be closed in the very near

		<p>provisions have not changed since September 2018.</p> <p>IESC understands that agreement between Eni Ghana and WBG is close with respect to finalising the current draft SMP.</p> <p>Project need for state-sponsored security back-up provision for the operational ORF. Currently, there is only an informal agreement/understanding between Eni Ghana and the local police regarding the role of the police in providing security. Such an agreement/understanding is not sufficient.</p>	<p>Construction and Production</p>	<p>Eni Ghana plans that impinge on security-related issues (such as the Production phase Fisheries Management Plan).</p> <p>An MoU to be reached, as soon as possible on the use of State actors (Navy and/or Army) in the protection of offshore and onshore assets and personnel (especially the operational ORF). This MoU should be based, to the extent practical, on international and O&G sector guidance; such as IFC's (2017) Good Practice Handbook entitled '<i>Use of Security Forces: Assessing and Managing Risks and Impacts: Guidance for the Private Sector in Emerging Markets</i>'.</p> <p>An 'agreement' between the Project and the police should be formalized soon, perhaps via an MoU, to remove the uncertainty inherent in an informal 'agreement'.</p>		<p>future. Work is continuing on the other items)</p>
011_ 5/19	<p>Project Security Management Plan – fishing vessel incursions</p>	<p>Incursion of fishermen into exclusion zones</p>	<p>PS4</p> <p>Construction and Production</p>	<p>Efforts to enforce exclusion zones must continue/new initiatives need to be sought. Eni Ghana should continue liaison with other O&G operators in the region (and consider experience from other West African regions and those beyond West Africa to identify effective practices that may be transferable to OCTP).</p> <p>Continue with efforts with Ghanaian authorities, such as GMA and GNPC, to expedite agreement on measures and mechanisms that can improve offshore security in both the short and long-term (recognizing that a sustainable long-term solution/s may not be implemented for several years). These efforts to include concluding an MoU with the Ministry of</p>	<p>High</p>	<p>Open (Work is continuing)</p>

				Defence with respects to the contribution of the Navy to provision of offshore security.		
013_5/19	Livelihood Restoration (LR) Programme Support Services	Certain sites selected for LR Programme Support Services options may have caused environmental harm to forested areas/swamps resulting in habitat loss.	PS 5 and PS6 Construction and Production	Eni Ghana (environmental team) and TechnoServe to work together to create a simple E&S screening procedure to guide site selection with allocation of responsibility to senior HSE staff members in terms of making the final decision and then sign off. Supervision of option implementation including a monitoring procedure), for certain cases, up to the point where the option is operational should be part of the appraisal process. The extent of any habitat loss due to livelihood restoration activities has now been calculated and included in overall Project calculations of net loss of natural habitat.	Moderate	Closed
014_5/19	Site drainage and erosion control	Eni Ghana, under advice from ESL, has chosen to regenerate swamp (by lowering the ground level) rather than use soft engineering options to reduce erosion and subsequent sedimentation of the swamp.	PS6/PS3 Construction	It is unclear how successful the concept will be. Water levels in swamp areas at the time of the visit were relatively high however were not inundating the area at the point of surface water discharge. This approach needs to be carefully monitored and soft engineering measures implemented if the concept of swamp regeneration fails. Situation now seems to have improved but monitoring remains ongoing.	Minor	Closed (measures appear to have been successful)
015_5/19	Reinstatement - Removal of soil	The disposal strategy for the large quantity of waste soil stored behind the Consar laydown is not described in the ORF Reinstatement and Restoration Plan and is therefore unclear.	PS6/PS3 Construction	The quantity of waste soil should be calculated and a clear disposal/reuse strategy prepared. Priority should be given to beneficial reuse.	Minor	Closed

017_5/19	Additional conservation actions	The selection of additional conservation actions has not been made, but is underway, and will be presented in revised Avian and MMST BAPs.	PS6 Operations	The ACAs should complement the requirement for no net loss of wetland habitat and clearly presented in revised versions of the BAPs for WBG review. The original authors of the BAPs should provide input into the revision of BAPs and the ACAs defined therein. ACAs now included in the BAPs.	Moderate	Closed
018_5/19	Biodiversity: Environmental Monitoring of Wetland Water Levels and Vegetation	The culverts, located close to the GNGC pipeline tie in, that have installed beneath the access road and pipeline to maintain the hydrological connectivity and functioning in the adjacent wetland natural habitats appear to be position above the dry season water level	PS6 Construction and Operation	Water levels in the wetlands <u>either side</u> of the RoW should be monitored over the long-term to check that hydrological connectivity and functionality has been maintained and that changes are not impacting the wetland habitats. No deleterious effects noted to date but monitoring is ongoing to allow for adaptive management if required.	Minor	Closed (on the basis of no detrimental impact today and understanding that monitoring will be ongoing)
019_5/19	Biodiversity: No Net Loss of natural habitats	The Identification and Assessment of Potential No Net Loss Options, scheduled to be completed by Q1 2019, has not been initiated	PS6 Construction and Operation	It is recommended that Eni Ghana initiate the prescribed programme as soon as possible and reports the findings of its options study to the WBG. The NNL Strategy for Natural Habitat is now in place with the full Implementation Plan due for completion by end 2021.	Moderate	Open (Strategy now in place and awaiting full Implementation Plan)
012_09/18	Labour management	Reinforcement of induction training on worker terms and conditions of employment and worker rights and responsibilities	PS2 Construction and Production	Amend the Worker Management Plan to contain a requirement for repeat refresher training on worker terms and conditions of employment and worker rights and responsibilities (as provided to new recruits during induction) and then implement the refresher training according to the schedule set out in the revised Worker Management Plan.	Minor	Open (The Workers Management Plan -Production [SUST-Plan-003] includes actions on refresher training. The

						IESC will seek to close this item after inspection of Eni Ghana's corrective action log during the next IESC monitoring visit).
025_09/18	Biodiversity: Sea Turtle Biodiversity Action Plan	Security personnel are not completing patrols of the beach in the concession at night during peak nesting period (June–August) as part of their regular circuit.	PS6 Construction and Operation	Eni Ghana to ensure that the all security personnel are trained and motivated to perform these patrols. It would be appropriate for GWS to provide this training. As the security contract for the operational phase is being handed to a new provider (G4S), additional training and motivation is required to implement the security patrols. This activity now forms part of ESL's beach monitoring survey activity and although no enforcement action is possible this does act as a deterrent with one poaching attempt abandoned as a direct result of the patrol and the nest safely relocated to a hatchery)	Minor	Closed
026_09/18	Biodiversity: Sea Turtle Biodiversity Action Plan	It is understood that GWS has submitted a proposal to Eni Ghana for the completion of a community conservation programme and that this is being currently under consideration in Eni Ghana's procurement process	PS6 Construction and Operation	IESC recommends that the GWS proposal is shared with the IESC and Lenders for review and that a timetable for implementation of a community conservation programme is confirmed. This task has now been taken on by ESL with the successful commencement of an awareness campaign and clear annual BAP targets set.	Moderate	Closed
027_09/18	Biodiversity: Avian	The Avian BAP includes the action " <i>Engage and contribute to</i>	PS6	It is recommended that Eni Ghana progresses a long-term programme of community-	Moderate	Open

	Biodiversity Action Plan	<i>existing community-based Vulture conservation programme.</i> It is understood that some engagement sessions were completed in 2017, but that Eni Ghana has no existing plans to progress this action.	Construction and Operation	engagement focusing on vulture conservation, possibly targeted to the nearby villages known to hunt vultures. This task has now been taken on by ESL with vulture conservation signage now drafted and awaiting approval prior to full roll out of the awareness campaign and clear annual BAP targets set.		(Plan in place though awaiting commencement of community participation as required by the BAP)
006_03/18	FPSO walkover	Large quantities of fuel/other hydrocarbon-based products were stored without localised secondary containment.	PS1 Operations	Project should consider localised secondary containment around the stockpile and reducing the number of drums stockpiled on board the FPSO.	Minor	Closed (IESC unable to verify due to travel restrictions)
007_03/18	FPSO walkover	A 200-litre drum containing unknown contents was present. The IESC understands the drum has been on board since the FPSO left Singapore.	PS1 Operations	Efforts are required to identify the contents of the drum. The drum and its contents should be safely disposed in accordance with the approved waste management plan.	Minor	Open (IESC will seek to close this item following review Eni Ghana's corrective action log during the next site visit).
008 9/17	Human Resources Policy	Eni Ghana does not have a Human Resources Policy that is tailored to its operations in Ghana.	Construction and Operations PS2	Prepare, approve, disseminate and implement an Eni Ghana – specific Human Resources Policy. This policy to include explicit statements that child and forced labour will not be employed and trafficked persons will not be hired.	Minor	Open (A policy is still required. It is recognized that the Recruitment, Employment and Training

						Plan and Worker Management Plan both cover the issues, mentioned in the column opposite, to varying extents).
009 9/17	Forced labour	The Recruitment, Employment and Training Plan does not contain a clear commitment that forced labour will not be employed.	Construction and Operations PS2	The Recruitment, Employment and Training Plan to be amended to contain a clear commitment that forced labour will not be employed.	Minor	Open (No revised Recruitment, Employment and Training Plan incorporating the required commitment has been prepared).
010 9/17	Accommodation Provision	No Eni Ghana accommodation policy exists.	Construction and Operations PS2	Prepare, approve, disseminate and implement an Accommodation Policy or incorporate it into a (combined) Human Resources and Workers' Accommodation Policy.	Minor	Open (No Accommodation Policy or Human Resources Policy has been prepared. A stand-alone policy or one combined with a Human Resources Policy is still required).

<p>019 9/17</p>	<p>Contractor Management - security</p>	<p>Appendix Q is not always issued to all contractors.</p>	<p>Construction and Operation PS4</p>	<p>Appendix Q to be updated to reflect the approved and 'signed off' Security Management Plan requirements (approval and 'sign off' has not yet occurred) regarding application of the Voluntary Principles for Security and Human Rights to procurement and management of security providers. Once updated and revised Appendix Q to be issued with all ITTs/model contracts to prospective contractors (with a proviso that a contractor can seek Eni Ghana approval that security requirements are not applicable to its operations).</p>	<p>Moderate</p>	<p>Open (The SMP is close to approval/sign-off and then Appendix Q will be updated accordingly).</p>
<p>022 9/17</p>	<p>Influx Management</p>	<p>The potential effectiveness of the Influx Management Plan is threatened by the limited progress to date in establishing the collaborative Multi-Stakeholder Forum for managing cumulative impacts, including coordinated actions to manage influx.</p>	<p>Construction and Operations PS5</p>	<p>Eni Ghana must continue to support WBG efforts to establish a collaborative Multi-Stakeholder Forum. Establish whether the 'influx management approach' prepared by WRCF, is an appropriate basis for revising the Influx Management Plan by end of Q4 2017.</p>	<p>Moderate</p>	<p>Open (The Multi-Stakeholder Forum is not yet established and functioning (See comment for item ID 027_2/17). This element remains OPEN. The recommendation about the influx management approach' is closed.</p>

<p>021 2/17</p>	<p>Contractor Management - security</p>	<p>The extent of the involvement of the Security Manager in the procurement of contractors is limited.</p>	<p>PS 4 Construction and Operation</p>	<p>Ensure that the Security Management Plan will contain minimum requirements to be met by contractors and that these requirements will be factored into procurement processes (and subsequent contractor management) with regards to security provision.</p>	<p>Moderate</p>	<p>Open (Currently, as of mid-May 2021, this remains an OPEN action. Appendix Q needs to be revised to reflect the final version of this Plan and then the revised Appendix Q needs to be incorporated into all documentation provided to potential contractors.</p>
---------------------	---	--	---	---	------------------------	---

APPENDIX 5 PHOTOLOG



Photo 1 (2018)

Surface water outfall at ORF showing significant erosion leading to sedimentation of swamp



Photo 2 (2021)

Stabilisation following revegetation



Photo 3 (2019)

Disturbed area at Landfall Terminal End



Photo 4 (2021)

Revegetation with bare patches requiring further attention



Photo 5 (2019)

Replanting of coconut palms – beach area



Photo 6 (2021)

Area fenced off to protect from animals and other users



Photo 7 (2019)

Pipeline berm with protective cover to assist vegetation growth



Photo 8 (2021)

Removal of cover following successful reestablishment of vegetation.
Removal of blue plastic sheeting required



Photo 9 (2019)

Former topsoil storage areas with saplings



Photo 10 (2021)

Good progress evident by growth of saplings and natural revegetation



Photo 11 (2019)

Former Consar work area showing soil stockpile generated during earth clearing works at the PAC



Photo 12 (2021)

Removal of stockpiles and reinstatement of area